

I. Mr. Depp's Fourth Interrogatories

Mr. Depp's Fourth Interrogatories (**Ex. 1**) have been pending since February 2021 and could not be more basic and appropriate. They are set forth below verbatim:

1. Describe in detail each and every incident during which You contend that You suffered any form of violence or abuse at the hands of Mr. Depp.
2. Identify all Persons with firsthand personal knowledge of any of the incidents described in Your response to the preceding Interrogatory.
3. Describe in detail each and every injury You contend You received as a result of any conduct by Mr. Depp.
4. Identify all Persons that have firsthand personal knowledge of any injuries You received as a result of any conduct by Mr. Depp.
5. Describe in detail any and all medical or psychological treatment You received as a result of any injury caused by Mr. Depp.
6. State all facts that support any contention that You have suffered damages, whether monetary, emotional, or otherwise, as a result of any allegedly defamatory statements by Mr. Depp and/or Adam Waldman.

These interrogatories obviously go to the heart of the case, particularly Ms. Heard's \$100 million Counterclaim. Ms. Heard should *want* to answer these questions regarding her own abuse and damages allegations, and she certainly cannot expect to be able to proceed to trial without disclosing this information in discovery. Yet mystifyingly, Ms. Heard has refused to agree to provide full and complete responses. Instead, Ms. Heard objected (incorrectly) that Mr. Depp had already served in excess of 30 interrogatories; Mr. Depp disagrees with Ms. Heard's count (the actual number of prior interrogatories is 18),¹ but in an effort to compromise, Mr. Depp offered to stipulate to additional interrogatories for both parties if Ms. Heard would serve full and complete responses. Ms. Heard's counsel indicated they would agree to additional

¹ Even if the Court agreed with Ms. Heard's assertion that the number of interrogatories exceeds 30, the Court can and should allow additional interrogatories for good cause shown. Va. R. S. Ct. 4:8(g). Here, *Mr. Depp served his Fourth Interrogatories after Ms. Heard dramatically altered this case by serving her \$100 million Counterclaim*, and good cause clearly exists to require Ms. Heard to answer these basic questions under the circumstances. Accordingly, even if the Court accepts Ms. Heard's (erroneous) calculation, it should enter an Order authorizing these interrogatories, deem them re-served as of the date of the hearing on this Motion, and direct that full and complete responses be provided on shortened time.

interrogatories and would serve some type of substantive responses to these interrogatories – only to refuse point blank to enter into a Consent Order to provide full and complete substantive responses. Troublingly, Ms. Heard’s counsel would not even make a simple *representation* that they would provide “full and complete” responses to the Fourth Interrogatories, forcing Mr. Depp to conclude that they intended to serve responses that were *not* full and complete, and that their offer was nothing more than a delay tactic. Full and complete responses should be ordered.

II. Mr. Depp’s Tenth RFPs

Ms. Heard is also stonewalling on Mr. Depp’s Tenth RFPs. (**Ex. 2.**)

Mr. Depp’s Tenth RFP **Nos. 1-18** seek records relevant to Ms. Heard’s allegations of psychological damages and harm, including PTSD. Ms. Heard alleges that she is suffering from a range of mental and emotional injuries that she contends are attributable to abuse from Mr. Depp, and she is using that contention to bolster both her underlying factual allegations to have been abused, and her claim to have suffered \$100 million in damages. Accordingly, she has placed her mental and emotional condition squarely at issue. These RFPs seek a range of medical and psychological records—including records of Ms. Heard’s “forensic psychological evaluation” that she underwent for use in this case, as well as past and present diagnoses and treatments, with a particular emphasis on exploring *whether* Ms. Heard actually does exhibit any such symptoms or has ever received treatment for them; and, if so, *when and why* she began suffering from these psychological issues. The relevance of this is self-evident: Ms. Heard has publicly claimed to have been a victim of abuse from a very young age (indeed, she made that public assertion in the very Op-Ed at issue in this case), so if she is actually suffering any form of psychological trauma, it could have a number of historical causes. Given the nature of Ms. Heard’s allegations, Mr. Depp must unfortunately explore the history of her mental condition

and treatments, including her condition before she met Mr. Depp, in order to address at trial Ms. Heard's anticipated efforts to present evidence that the Depp/Heard relationship was somehow the cause of psychological harm. Mr. Depp must also explore alternate causes and whether such issues predated the relationship. Mr. Depp recognizes the sensitivity of the information sought and will stipulate to its confidentiality, but has no realistic alternative to seeking this discovery, given the nature of Ms. Heard's allegations.

Mr. Depp's Tenth **RFP Nos. 19-32** seek crucial documents supporting Ms. Heard's allegations of damages in her \$100 million Counterclaim. For instance, **RFP No. 19** seeks documents that support Ms. Heard's contention that she has suffered \$100 million in damages; **RFP Nos. 20-22** seek documents that evidence or support Ms. Heard's claim to have lost career opportunities such as endorsement deals as a result of the statements at issue in her Counterclaim; and **RFP Nos. 23-24** seek documents evidencing Ms. Heard's compensation from endorsement deals, all of which is relevant to assessing challenging the plausibility of her damages claims. **RFP Nos. 25-27** seek documents supporting Ms. Heard's claim to have received box office acclaim, which also goes to the core of her damages claim, since the plausibility of her \$100 million Counterclaim is contingent on the theory that she is a major box office draw and would have enjoyed truly spectacular professional success but for three statements by Adam Waldman. **RFP Nos. 28-29** seek documents and communications regarding the eight statements alleged in Ms. Heard's Counterclaim, which is about as basic as discovery can be, and **RFP Nos. 30-32** seek communications with Ms. Heard's employers regarding various potential causes of the reputational harm she is claiming, including Mr. Depp's allegations in this action in the UK action, as well as Adam Waldman. Again, Ms. Heard is

claiming damage to career prospects, and cannot avoid turning over communications with her employers on these topics.

Finally, **RFP No. 33** seeks communications between Ms. Heard and her close friends and confidantes regarding her relationship with Mr. Depp after January 2014 – by which point Ms. Heard has claimed to have disclosed her abuse claims to some or all of these individuals. These documents are reasonably calculated to lead to admissible evidence of any discussions among these persons of her abuse claims or (just as significantly), the lack of such discussions.

III. Mr. Depp's Eleventh RFPs

Ms. Heard's also failed to respond appropriately to Mr. Depp's Eleventh RFPs (**Ex. 3.**)

RFP Nos. 1, 2, 5, 7, 10, 13, 14, 18, 22, 24, 26, 32, and 35 seek documents that relate to particular incidents of alleged abuse described in Ms. Heard's UK Witness Statement (at paragraphs 44-51, 52-64, 65-83, 84-92, 94-96, 97-98, 99-130, 131-134, 135, 136, 137-147). Ms. Heard inappropriately limited the scope of her response with ambiguous language that she will produce documents "that refer to or reflect *the paragraphs*... referred to in this request, if any." But the RFPs in question are not focused on the drafting of the *paragraphs*, but on the particular *events alleged* in those paragraphs. This limiting language is improper and leaves Mr. Depp in the dark as to what (if anything) Ms. Heard intends to produce.

RFP Nos. 3, 6, 11, 15, 20, 23, 27, and 36 seek documents and communications that mention or refer to Mr. Depp on dates of alleged instances of abuse. Ms. Heard's responses improperly limit the scope of her production, stating only (subject to objections) that she will produce documents that "mention or refer to [each particular alleged incident of abuse]." But the RFPs are broader than that. Documents that mention abuse on those dates would no doubt be relevant, but references to Mr. Depp on those dates that do not mention abuse are also relevant to

undercutting her allegation that she was abused on those dates. Ms. Heard must produce all responsive documents, without her qualifying language. **RFP No. 4** seeks communications among a list of Ms. Heard's close friends regarding her relationship with Mr. Depp during a timeframe (post-2014) when they are alleged to have been aware of her abuse allegations. **RFP No. 12** seeks communications among Ms. Heard's friends regarding her wedding to Mr. Depp, when Ms. Heard contends that her confidantes were aware of her claims, and when it has been alleged that some friends were attempting to dissuade Ms. Heard from marrying Mr. Depp because of her abuse claims. Again, the relevance of such requests is clear.

RFP Nos. 16, 21, 25, 28, seek documents that refer to Mr. Depp close to particular alleged incidents of abuse. These are reasonably calculated to lead to the discovery of admissible evidence that could shed light on Ms. Heard's attitude toward Mr. Depp in the days following supposed incidents of abuse, and are relevant to Ms. Heard's credibility. **RFP No. 17** seeks photographs taken during the timeframe of an alleged incident in Australia. Ms. Heard improperly objects and limits the scope of her response to pictures of the alleged incident – but the scope of the request is broader than that, and Mr. Depp is entitled to explore the entirety of the trip to Australia, to put Ms. Heard's allegations in context and assess their credibility. **RFP No. 29** seeks documents related to Ms. Heard's appearance on the Late Late Show with James Corden, when Ms. Heard alleges she had extensive injuries to her face during an appearance on public television when she appeared without any visible injury. Again, the relevance is obvious, but Ms. Heard stands on her improper objections. **RFP No. 31, 33, and 34** seek communications among Ms. Heard and certain of her friends (to whom she contends she disclosed her purported injuries) during particular key timeframes. Ms. Heard improperly limits the scope of her responses with improper qualifying language.

Dated: December 22, 2021

Respectfully submitted,

Ben G. Chew ^{AE}

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Counsel for Plaintiff John C. Depp, II

VIRGINIA: IN THE CIRCUIT COURT OF FAIRFAX COUNTY

John C. Depp, II

Plaintiff vs. Amber Laura Heard Defendant

Civil Action No. CL 2019 - 0002911

Previous Chancery No. CH 2019 - 0002911

FILED MOTIONS DOCKET DEC 22 PM 3:05 JOHN T. FREY CHIEF CLERK, CIRCUIT COURT OF FAIRFAX COUNTY

SERVE:

FRIDAY MOTIONS DAY - PRAECIPE/NOTICE

Moving Party: [X] Plaintiff [] Defendant [] Other

Title of Motion: Motion to Compel 4th Rogs and 10th and 11th RFPs [X] Attached [] Previously Filed

DATE TO BE HEARD: January 7, 2022 Time Estimate (combined no more than 30 minutes): 30 minutes

Time to be Heard: [] 9:00 a.m. with a Judge [X] 10:00 a.m. (Civil Action Cases) Does this motion require 2 weeks notice? [X] Yes [] No [] 11:30 a.m. (DOMESTIC/Family Law Cases) Does this motion require 2 weeks notice? [] Yes [] No

Case continued from: (Date) continued to: (Date)

Judge Penney S. Azcarate must hear this motion because (check one reason below):

- [] The matter is on the docket for presentation of an order reflecting a specific ruling previously made by that Judge. [X] This Judge has been assigned to this entire case by the Chief Judge; or, [] The Judge has advised counsel that all future motions, or this specific motion, should be placed on this Judge's Docket; or, [] This matter concerns a demurrer filed in a case where that Judge previously granted a demurrer in favor of demurrant.

PRAECIPE by: Benjamin G. Chew Brown Rudnick LLP

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CERTIFICATIONS

I certify that I have in good faith conferred or attempted to confer with other affected parties in an effort to resolve the subject of the motion without Court action, pursuant to Rule 4:15(b) of the Rules of the Supreme Court of Virginia; and, I have read, and complied with, each of the Instructions for Moving Party on the reverse side of this form.

Ben G. Chew (Signature) Moving Party/Counsel of Record

CERTIFICATE OF SERVICE

I certify on the 22nd day of December, 2021, a true copy of the foregoing Praecipe was [] mailed [] faxed [X] delivered to all counsel of record pursuant to the provisions of Rule 4:15(e) of the Rules of the Supreme Court of Virginia.

Ben G. Chew (Signature) Moving Party/Counsel of Record

INSTRUCTIONS FOR MOVING PARTY

DATE/TIME: All motions should be noticed for the 10:00 a.m. Civil Action Docket or the 11:30 a.m. Domestic/Family Law Docket (All Divorce cases, adoptions and Juvenile & Domestic Relations Court Appeals) unless the moving party believes the motion will be uncontested. All motions believed to be uncontested should be noticed for 9:00 a.m.. **A minimum of two weeks' notice is required for all motions for Summary Judgment, Demurrers, Pleas in Bar, motions pertaining to discovery disputes and other motions for which any party desires to file a memorandum.** A memorandum of points and authorities of five pages or less must accompany any of these pleadings and any other motion placed on the Two-Week Docket. If either party believes it necessary to file a memorandum exceeding five double-spaced pages, then the parties must utilize the Briefing Schedule procedure: contact opposing counsel or the opposing party and by agreement conduct a telephone conference call with the Calendar Control Judge, (703) 246-2221; or, if agreement is not possible, give advance notice of an appearance before the Calendar Control Judge to establish a Briefing Schedule.

Each side should bring a draft proposed order to Court on the day of the hearing, as the ruling must be reduced to an order that day, absent leave of Court. Cases may only be removed from the docket by the Court or by counsel for the moving party or the moving party. One Week Motions may be removed from the docket up until 4:00 p.m. on the Thursday preceding the hearing date, by contacting the Motions Clerk: (703) 246-4355. Two Week Motions may not be continued or removed from the docket after 4:00 p.m. on the Friday preceding the hearing date, without leave granted by the Judge assigned to hear the motion, for good cause shown.

If a hearing on any motion must take longer than thirty (30) minutes, the moving and responding parties, or their counsel, should appear before the Calendar Control Judge to request a hearing for a day other than a Friday. See, "Motions Requiring More than 30 Minutes" in "Friday Motions Docket Procedures" on the Court's website at <https://www.fairfaxcounty.gov/circuit/sites/circuit/files/assets/documents/pdf/civil-friday-motions-docket-procedures.pdf>

MOTIONS TO RECONSIDER: Do not set a Motion to Reconsider for a hearing. (See Friday Motions Docket Procedures, available from the Clerk's Office, the Bar Association office or on the Court's website at the address above.

CERTIFICATIONS OF MOVING PARTY/COUNSEL: Rule 4:15 (b) of the Rules of the Supreme Court of Virginia provides in pertinent part that "Absent leave of court, and except as provided in paragraph (c) of this Rule, reasonable notice shall be in writing and served at least seven days before the hearing. Counsel of record shall make a reasonable effort to confer before giving notice of a motion to resolve the subject of the motion **and to determine a mutually agreeable hearing date and time.**"

CERTIFICATE OF SERVICE: Pursuant to Rule 4:15 (e), a motions pleading shall be deemed served when it is actually received by, or in the office of, counsel of record through delivery, mailing, or facsimile transmission; not when it is mailed or sent.

INFORMATION FOR MOVING PARTY

CONCILIATION PROGRAM: The Fairfax Circuit Court strongly encourages use of conciliation procedures to resolve motions. The Fairfax Bar Association's Conciliation Program conducts conciliation without charge by experienced litigators, who meet in person or by telephone with all interested parties. To request conciliation, fax a Request for Conciliation form to the Fax Hotline, (703) 273-1274; e-mail a request for conciliation to: ffxconciliation@aol.com; or leave a voice mail message at (703) 627-1228. You will be contacted before the hearing date by a representative of the Conciliation Program.

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

Upon consideration of Plaintiff's Motion to Compel Defendant Amber Laura Heard to Respond to Mr. Depp's Fourth Interrogatories and Tenth and Eleventh Requests for Production ("Plaintiff's Motion"), Plaintiff's memorandum of law in support thereof, any opposition, and the record, it is, this ____ day of _____ 2022, hereby ORDERED as follows:

1. Plaintiff's Motion is GRANTED;

The Honorable Penney S. Azcarate
CHIEF JUDGE

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:

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SEEN AND OBJECTED TO:

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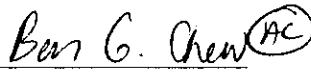
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 22nd day of December 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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CW 2019-2911

UNDER SEAL

Contains materials

Subject to

protective order.

EXHIBIT 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

**DEFENDANT AND COUNTERCLAIM PLAINTIFF AMBER LAURA HEARD'S
OBJECTIONS AND RESPONSES TO PLAINTIFF AND COUNTERCLAIM
DEFENDANT'S FOURTH SET OF INTERROGATORIES**

Pursuant to Rule 4:8 of the Rules of the Supreme Court of Virginia ("Rules"), Defendant and Counterclaim Plaintiff Amber Laura Heard, by and through her attorneys, submits these objections and responses (the "Responses") to Plaintiff and Counterclaim Defendant John C. Depp, II's Fourth Set of Interrogatories dated February 12, 2021 (the "Interrogatories").

GENERAL OBJECTIONS

The following general objections and responses (the "General Objections") are incorporated into each specific objection and response (the "Specific Objections") as if fully set forth therein:

1. Defendant and Counterclaim Plaintiff objects that Plaintiff and Counterclaim Defendant has exceeded the permissible number of Interrogatories, including all parts and subparts, in violation of Rule 4:8(g).
2. Defendant and Counterclaim Plaintiff objects to the Interrogatories to the extent they would require Defendant and Counterclaim Plaintiff to provide or reveal the contents of any document or information privileged from disclosure pursuant to the attorney-client privilege, the

qualified immunity provided to litigation work product, or any other applicable privilege. Defendant and Counterclaim Plaintiff will not provide such information. Defendant and Counterclaim Plaintiff has withheld certain documents and information from production in response to these Interrogatories. Defendant and Counterclaim Plaintiff has withheld correspondence between Defendant and Counterclaim Plaintiff and counsel relating to this litigation. Materials withheld under this classification include letters from counsel to Defendant and Counterclaim Plaintiff; letters from Defendant and Counterclaim Plaintiff to counsel; draft materials provided to Defendant and Counterclaim Plaintiff by counsel for review and comment; draft materials provided to counsel by Defendant and Counterclaim Plaintiff for review and comment; and documents given to counsel which were prepared by Defendant and Counterclaim Plaintiff at the express request of counsel, in anticipation of litigation, in order to set forth facts and/or other matters relating to this litigation. These materials are protected by the attorney-client privilege and by the qualified immunity from disclosure afforded to litigation work product by Rule 4:1(b)(3) of the Rules of the Virginia Supreme Court.

No index has been prepared with respect to correspondence between Defendant and Counterclaim Plaintiff and counsel related to this litigation. The fact that the documents which have been withheld constitute correspondence between a party and that party's counsel relating to the pending litigation describes the withheld documents with a degree of particularity sufficient to permit other parties to assess the applicability of the privilege or protection.

3. Defendant and Counterclaim Plaintiff objects to these Interrogatories the extent they are vague, ambiguous, overly broad, unduly burdensome, seek information and documents not relevant to the claims or defenses of any party, or are not proportional to the needs of the case.

4. Defendant and Counterclaim Plaintiff objects to the Interrogatories to the extent they require unreasonable measures to locate and produce responsive documents and information. Defendant and Counterclaim Plaintiff will construe the Interrogatories to require a reasonable and diligent search of reasonably accessible files where she would reasonably expect to find information, documents, or things related to the Interrogatories.

5. Defendant and Counterclaim Plaintiff objects to these Interrogatories to the extent that they purport to call for a legal conclusion.

6. Defendant and Counterclaim Plaintiff objects to these Interrogatories to the extent that they are compound, overlapping, duplicative and/or redundant of other Interrogatories or Requests for Production served by Plaintiff and Counterclaim Defendant.

7. Defendant and Counterclaim Plaintiff objects to each Interrogatory to the extent that it calls for documents and information that: (a) may be derived or ascertained from documents and information that have been or will be produced in this action; (b) is already in Plaintiff and Counterclaim Defendant's possession, custody, or control; (c) is publicly available; or (d) is otherwise independently available to Plaintiff and Counterclaim Defendant or his counsel.

8. Defendant and Counterclaim Plaintiff objects to the Interrogatories to the extent they seek documents and information that are not within Defendant and Counterclaim Plaintiff's possession, custody, or control. Subject to this General Objection, in responding to the Interrogatories, Defendant and Counterclaim Plaintiff will provide only responsive documents and information within Defendant and Counterclaim Plaintiff's possession, custody, or control.

9. Defendant and Counterclaim Plaintiff objects to the Interrogatories to the extent they are based on a false premise and contain express or implied assumptions of fact or law with

respect to matters at issue in this case. Defendant and Counterclaim Plaintiff's Responses to the Interrogatories are not intended to be and shall not be construed as an agreement or concurrence with Plaintiff and Counterclaim Defendant's characterization of any facts, circumstances, or legal obligations. Defendant and Counterclaim Plaintiff reserves the right to contest any such characterization as inaccurate.

10. Defendant and Counterclaim Plaintiff objects to the Interrogatories to the extent they seek information in excess of that required to be provided by Rules 4:1(b)(6) and 4:8 of the Rules of the Virginia Supreme Court, or are otherwise outside the scope of permissible Interrogatories.

11. Defendant and Counterclaim Plaintiff objects to the Definitions and Instructions to the extent they seek to impose obligations greater than those imposed by the Rules or any other applicable law, rule, ruling of this court, or agreement of the parties.

12. Defendant and Counterclaim Plaintiff expressly reserves all rights and privileges under the Rules and any other applicable law or rule. The failure to assert such rights and privileges or the inadvertent disclosure by Defendant and Counterclaim Plaintiff of information or documents protected by such rights or privileges shall not constitute a waiver thereof, either with respect to these Responses or with respect to any future discovery objections or responses.

OBJECTIONS TO DEFINITIONS

1. Defendant and Counterclaim Plaintiff objects to Definition No. 1's inclusion of "entity type" on the grounds that it is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues

at stake in the litigation, and because it seeks information beyond the scope of Va. Sup. Ct. R. 4:8.

2. Defendant and Counterclaim Plaintiff objects to Definition No. 2(b), (c), and (d)'s inclusion of business information, business affiliation, business contact information, and employment information on the grounds that they are overly broad, unduly burdensome, and seek information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, and because it seeks information beyond the scope of Va. Sup. Ct. R. 4:8.

3. Defendant and Counterclaim Plaintiff objects to Definition No. 5 the grounds that it is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, and because it seeks information beyond the scope of Va. Sup. Ct. Rs. 4:8 and 4:1. Defendant and Counterclaim Plaintiff further objects to this Definition to the extent it seeks information protected by the attorney-client privilege, and on the grounds that this Definition invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

4. Defendant and Counterclaim Plaintiff objects to Definition No. 6 as vague.

ambiguous, and failing to define with particularity the information that it seeks, as it defines words in a circular, confusing, and non-specific manner, and is therefore unduly burdensome.

5. Defendant and Counterclaim Plaintiff objects to Definition No. 7 as vague, ambiguous, and failing to define with particularity the information that it seeks.

OBJECTIONS TO INSTRUCTIONS

1. Defendant and Counterclaim Plaintiff objects to Instruction No. 1 on the grounds that it is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, and because it seeks information beyond the scope of Va. Sup. Ct. Rs. 4:8 and 4:1(b).

Defendant and Counterclaim Plaintiff further objects to this Instruction to the extent it seeks information protected by the attorney-client privilege, and on the grounds that this Instruction invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court, and because the Instruction incorrectly defines the scope of the work product doctrine in Virginia. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

2. Defendant and Counterclaim Plaintiff objects to Instruction No. 2 on the grounds that it is overly broad and unduly burdensome because it seeks information beyond the scope of Va. Sup. Ct. R. 4:8, and because it exceeds the requirements of Va. Sup. Ct. R. 4:1(e).

3. Defendant and Counterclaim Plaintiff objects to Instruction No. 3 on the grounds that it is overly broad and unduly burdensome because it seeks information beyond the scope of

Va. Sup. Ct. R. 4:8, because it exceeds the requirements of Va. Sup. Ct. R. 4:1(e).

4. Defendant and Counterclaim Plaintiff objects to Instruction No. 4 on the grounds that it is overly broad and unduly burdensome because it seeks information beyond the scope of Va. Sup. Ct. R. 4:8, and because it exceeds the requirements of Va. Sup. Ct. R. 4:1(e).

5. Defendant and Counterclaim Plaintiff objects to Instruction No. 5 on the grounds that it is overly broad and unduly burdensome because it seeks information beyond the scope of Va. Sup. Ct. R. 4:8, and because it exceeds the requirements of Va. Sup. Ct. R. 4:1(e).

6. Defendant and Counterclaim Plaintiff objects to Instruction No. 6 on the grounds that it is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, and because it exceeds the scope of Va. Sup. Ct. R. 4:8(f).

7. Defendant and Counterclaim Plaintiff objects to Instruction No. 7 on the grounds that it is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, and because it seeks information beyond the scope of Va. Sup. Ct. Rs. 4:8 and 4:1(b).

Defendant and Counterclaim Plaintiff further objects to this Instruction to the extent it seeks information protected by the attorney-client privilege, and on the grounds that this Instruction invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the

Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

8. Defendant and Counterclaim Plaintiff objects to Instruction No. 8 to the extent it seeks to preserve or otherwise “pre-object” for objections that must be contemporaneously made at the time of trial or other hearing.

9. Defendant and Counterclaim Plaintiff objects to Instruction No. 9 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9 and 4:1(b)(6), and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in the litigation.

10. Defendant and Counterclaim Plaintiff objects to Instruction No. 10 because it exceeds the requirements of Va. Sup. Ct. R 4:8, and is therefore overly broad and unduly burdensome. This Instruction is particularly inappropriate and harassing as grossly beyond the requirements of Va. Sup. Ct. Rs. 4:1 and 4:8, and improperly attempts to create an artificial deadline for Defendant and Counterclaim Plaintiff to file early objections to Interrogatories, and/or to shift the burden of resolving or clarifying vague, ambiguous, or otherwise unclear Interrogatories issued by Plaintiff and Counterclaim Defendant onto Defendant and Counterclaim Plaintiff.

INTERROGATORIES

1. Describe in detail each and every incident during which You contend that You suffered any form of violence or abuse at the hands of Mr. Depp.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Interrogatory on the grounds that it exceeds the number of Interrogatories permitted under Va. Sup Ct. R. 4:8(g) when

counting all prior Interrogatories (including all parts, sub-parts, multiple, and compound inquiries) served by Plaintiff and Counterclaim Defendant.

RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this Interrogatory.

2. Identify all Persons with firsthand personal knowledge of any of the incidents described in Your response to the preceding Interrogatory.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Interrogatory on the grounds that it exceeds the number of Interrogatories permitted under Va. Sup Ct. R. 4:8(g) when counting all prior Interrogatories (including all parts, sub-parts, multiple, and compound inquiries) served by Plaintiff and Counterclaim Defendant.

RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this Interrogatory.

3. Describe in detail each and every injury You contend You received as a result of any conduct by Mr. Depp.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Interrogatory on the grounds that it exceeds the number of Interrogatories permitted under Va. Sup Ct. R. 4:8(g) when counting all prior Interrogatories (including all parts, sub-parts, multiple, and compound inquiries) served by Plaintiff and Counterclaim Defendant.

RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this Interrogatory.

4. Identify all Persons that have firsthand personal knowledge of any injuries You received as a result of any conduct by Mr. Depp.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Interrogatory on the grounds that it exceeds the number of Interrogatories permitted under Va. Sup Ct. R. 4:8(g) when

counting all prior Interrogatories (including all parts, sub-parts, multiple, and compound inquiries) served by Plaintiff and Counterclaim Defendant.

RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this Interrogatory.

5. Describe in detail any and all medical or psychological treatment You received as a result of any injury caused by Mr. Depp.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Interrogatory on the grounds that it exceeds the number of Interrogatories permitted under Va. Sup Ct. R. 4:8(g) when counting all prior Interrogatories (including all parts, sub-parts, multiple, and compound inquiries) served by Plaintiff and Counterclaim Defendant.

RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this Interrogatory.

6. State all facts that support any contention that You have suffered damages, whether monetary, emotional, or otherwise, as a result of any allegedly defamatory statements by Mr. Depp and/or Adam Waldman.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Interrogatory on the grounds that it exceeds the number of Interrogatories permitted under Va. Sup Ct. R. 4:8(g) when counting all prior Interrogatories (including all parts, sub-parts, multiple, and compound inquiries) served by Plaintiff and Counterclaim Defendant.

RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this Interrogatory.

March 5, 2021

AS TO OBJECTIONS:



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Plaintiff Amber Laura Heard*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 5th day of March, 2021, by email, by agreement of the parties. addressed as follows:

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Defendant John C. Depp, II*



Elaine Charlson Bredehoft

EXHIBIT 2

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

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

**DEFENDANT AND COUNTERCLAIM PLAINTIFF AMBER LAURA HEARD'S
OBJECTIONS AND RESPONSES TO PLAINTIFF AND COUNTERCLAIM
DEFENDANT'S TENTH SET OF REQUESTS FOR PRODUCTION**

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia ("Rules"), Defendant and Counterclaim Plaintiff Amber Laura Heard, by and through her attorneys, submits these objections and responses (the "Responses") to Plaintiff and Counterclaim Defendant John C. Depp, II's Tenth Set of Requests for Production dated November 3, 2021 (the "Requests").

GENERAL OBJECTIONS

The following general objections and responses (the "General Objections") are incorporated into each specific objection and response (the "Specific Objections") as if fully set forth therein:

1. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they are duplicative, cumulative, or seek documents that have already been provided through other means of discovery. Defendant and Counterclaim Plaintiff will not reproduce documents already produced in discovery.

2. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they are vague, ambiguous, overly broad, unduly burdensome, seek documents not relevant to the claims or defenses of any party, or are not proportional to the needs of the case.

3. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they impose any obligations or requirements beyond the scope of the Rules or any case law interpreting them.

4. Defendant and Counterclaim Plaintiff's Responses are not intended to be and shall not be construed as an agreement or concurrence that all documents and information provided are admissible with respect to the claims and defenses of Plaintiff and Counterclaim Defendant and/or Defendant and Counterclaim Plaintiff.

5. Defendant and Counterclaim Plaintiff objects to each Request to the extent that it calls for documents and information that: (a) may be derived or ascertained from documents that have been or will be produced in this action; (b) are already in Plaintiff and Counterclaim Defendant's possession, custody, or control; (c) are publicly available; or (d) are otherwise independently available to Plaintiff and Counterclaim Defendant or his counsel.

6. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they purport to call for documents or information that: (a) are subject to the attorney-client privilege; (b) constitute attorney work product; (c) are protected from disclosure based on common interest or a similar privilege; or (d) are otherwise protected from disclosure under an applicable privilege, law, or rule. Defendant and Counterclaim Plaintiff will not produce such documents and information in response to the Requests. and any inadvertent production thereof shall not be deemed a waiver of any privilege with respect to such documents and information.

7. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they require unreasonable or unduly burdensome measures to locate and produce responsive documents. Defendant and Counterclaim Plaintiff will construe the Requests to require a reasonable and diligent search of reasonably-accessible files within her possession, custody, or control where she would reasonably expect to find information, documents, or things related to the Requests.

8. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they seek documents and information that are not within Defendant and Counterclaim Plaintiff's possession, custody, or control. Subject to this General Objection, in responding to the Requests, Defendant and Counterclaim Plaintiff will provide only responsive documents within Defendant and Counterclaim Plaintiff's possession, custody, or control.

9. Defendant and Counterclaim Plaintiff objects to the Definitions and Instructions to the extent they seek to impose obligations greater than those imposed by the Rules or any other applicable law, rule, ruling of this court, or agreement of the parties.

10. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they are based on a false premise and contain express or implied assumptions of fact or law with respect to matters at issue in this case. Defendant and Counterclaim Plaintiff's Responses to the Requests are not intended to be and shall not be construed as an agreement or concurrence with Plaintiff and Counterclaim Defendant's characterization of any facts, circumstances, or legal obligations. Defendant and Counterclaim Plaintiff reserves the right to contest any such characterization as inaccurate.

11. Defendant and Counterclaim Plaintiff expressly reserves all rights and privileges under the Rules and any other applicable law or rule. The failure to assert such rights and

privileges or the inadvertent disclosure by Defendant and Counterclaim Plaintiff of information or documents protected by such rights or privileges shall not constitute a waiver thereof, either with respect to these Responses or with respect to any future discovery objections or responses. Defendant and Counterclaim Plaintiff's Responses to the Requests are made to the best of her present knowledge, information, and belief. These Responses are at all times subject to such additional or different documents and information that discovery or further investigation may disclose and, while based on the present state of Defendant and Counterclaim Plaintiff's knowledge and investigation, are subject to such additional knowledge of facts as may result from Defendant and Counterclaim Plaintiff's further discovery or investigation.

OBJECTIONS TO DEFINITIONS

1. Defendant and Counterclaim Plaintiff objects to Definition No. 2 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation to the extent it seeks documents beyond the scope of Va. Sup. Ct. R. 4:9(a). Since a "Chat Application" is a form of a "Document," Defendant and Counterclaim Plaintiff will interpret the phrase "Chat Application" in accordance with the definition included in Va. Sup. Ct. R. 4:9(a).

2. Defendant and Counterclaim Plaintiff objects to Definition No. 3 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties'

resources, and the importance of the discovery in resolving the issues at stake in the litigation to the extent it seeks documents beyond the scope of Va. Sup. Ct. R. 4:9(a). Since a “Communication” is a form of a “Document,” Defendant and Counterclaim Plaintiff will interpret the word “Communication” in accordance with the definition included in Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff further objects to this Definition to the extent it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Definition invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

3. Defendant and Counterclaim Plaintiff objects to Definition No. 4 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in the litigation. On September 18, 2020, the Fairfax County Circuit Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 6th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking documents during the parties’ marriage and related to the divorce litigation was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

4. Defendant and Counterclaim Plaintiff objects to Definition No. 5 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to

lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation to the extent it seeks documents beyond the scope of Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff will interpret the word "Document" in accordance with the definition included in Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff further objects to this Definition to the extent it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Definition invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

5. Defendant and Counterclaim Plaintiff objects to Definition No. 7 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, and because it seeks documents outside of Defendant and Counterclaim Plaintiff's possession, custody, or control. Defendant and Counterclaim Plaintiff further objects to this Definition to the extent it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Definition invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

6. Defendant and Counterclaim Plaintiff objects to Definition No. 10 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, including because on November 20, 2020, the Fairfax County Circuit Court ruled that discovery seeking documents "sufficient to reflect the impact" of the UK litigation "on Mr. Depp's reputation and career" was overly broad, unduly burdensome, and unreasonably vague, and therefore held that those Requests and this Request are beyond the scope of discovery in this case. And on December 18, 2020 the Fairfax County Circuit Court ruled that Request No. 23 of Mr. Depp's 2nd Requests for Document and Request 50 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications between Ms. Heard and The Sun/NGN was overbroad, and therefore held that Request and this Request are beyond the scope of discovery in this case. The Court also ruled that Request No. 51 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to the UK Action was also overbroad. Additionally, Mr. Depp repeatedly took the position in his Opposition to Ms. Heard's Supplemental Plea in Bar that this Action and the U.K. Action did not arise from the same transaction or occurrence.

7. Defendant and Counterclaim Plaintiff objects to Definition No. 11 as vague, ambiguous, and failing to define with particularity the documents and information that it seeks, as it defines words in a circular, confusing, and non-specific manner, and is therefore overly broad and unduly burdensome.

8. Defendant and Counterclaim Plaintiff objects to Definition No. 12 as vague,

ambiguous, and failing to define with particularity the documents and information that it seeks, and is therefore overly broad and unduly burdensome, as it attempts to define non-specific words, terms, and phrases without providing any such definition.

OBJECTIONS TO INSTRUCTIONS

1. Defendant and Counterclaim Plaintiff objects to Instruction No. 1 to the extent it exceeds the requirements of Va. Sup. Ct. R. 4:9(a), which only requires the production of documents “which are in the possession, custody, or control of the party upon whom the request is served,” and is therefore overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents in accordance with Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff further objects to this Instruction to the extent it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Instruction invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

2. Defendant and Counterclaim Plaintiff objects to the portion of Instruction No. 3 seeking “The date such additional documents came into your possession shall be specified, as well as the identity of the individuals who furnished such additional documents to the person preparing the response” because it exceeds the requirements of Va. Sup. Ct. R 4:9 by requesting substantive information in a response to a Request for Production of Documents, and is therefore overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

3. Defendant and Counterclaim Plaintiff objects to Instruction No. 4 because the request to “specify the reason(s) for your inability to respond to the remainder and stating whether information or knowledge you have concerning the portion to which you do not respond” exceeds the requirements of Va. Sup. Ct. R 4:9 by requesting substantive information in a response to a Request for Production of Documents, and is therefore overly broad, unduly burdensome, and seeks documents and information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

4. Defendant and Counterclaim Plaintiff objects to Instruction Nos. 5(b) and (c) because the requests to identify each document in the manner requested and to “provide a description of the subject matter of each document or item” exceed the requirements of Va. Sup. Ct. Rs 4:9 and 4:1(b)(6) by requesting substantive information in a response to a Request for Production of Documents, and are therefore overly broad, unduly burdensome, and seek documents and information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

5. Defendant and Counterclaim Plaintiff objects to Instruction No. 6 as unduly burdensome because the Defendant and Counterclaim Plaintiff has an ongoing duty under Va. Sup. Ct. R. 4:1(e) to supplement document production and responses when and where necessary, and this instruction is therefore overly broad and unduly burdensome. Defendant and Counterclaim Plaintiff further objects to this Instruction because by its plain language of “no documents in existence” it seeks for Defendant and Counterclaim Plaintiff to respond regarding documents anywhere “in existence” that are outside of Defendant and Counterclaim Plaintiff’s possession, custody, or control.

6. Defendant and Counterclaim Plaintiff objects to Instruction No. 7 to the extent it

seeks documents and information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court.

7. Defendant and Counterclaim Plaintiff objects to Instruction No. 8 because it exceeds the requirements of Va. Sup. Ct. R 4:9 by requesting substantive information in a response to a Request for Production of Documents, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

8. Defendant and Counterclaim Plaintiff objects to Instruction No. 9 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks documents and information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A).

9. Defendant and Counterclaim Plaintiff objects to Instruction No. 10 seeking “transmittal sheets and cover letters” on the grounds that the request for such documents is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff further objects to the extent this Instruction seeks documents protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme

Court.

10. Defendant and Counterclaim Plaintiff objects to Instruction No. 11 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information and documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A).

11. Defendant and Counterclaim Plaintiff objects to Instruction No. 12 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks documents and information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A). The Instruction is also ambiguous because it contradicts Instruction No. 9. Defendant and Counterclaim Plaintiff further objects to this instruction because a request to access, extract, inspect, and/or test Defendant and Counterclaim Plaintiff's devices raises significant issues of confidentiality and privacy, is subject to the balancing required by Va. Sup. Ct. R. 4:1(b)(1), and requires a heightened showing of relevance and discoverability that Plaintiff and Counterclaim Defendant has not demonstrated in this case. Such a request does not create a routine right of direct access to a party's electronic information and devices, as Courts guard against undue intrusiveness, undue burden, and significant overbreadth that results from the requested type of access, extraction, inspection, and/or testing. Additionally, Plaintiff and Counterclaim Defendant's UK Counsel confirmed on July 17, 2020 that Plaintiff and Counterclaim Defendant did not dispute the accuracy of the accompanying

date/time metadata to the May 2016 images, and further that any analysis of digital images will not yield any additional information than what can be seen from the images. For all of these reasons, Defendant and Counterclaim Plaintiff objects to this Instruction as overly broad, unduly burdensome, harassing, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation.

12. Defendant and Counterclaim Plaintiff objects to Instruction Nos. 13 and 14 on the grounds that they exceed the requirements of Va. Sup. Ct. R 4:9 and 4:1(b)(6), and are therefore overly broad, unduly burdensome, and seek information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

13. Defendant and Counterclaim Plaintiff objects to Instruction No. 15 because it seeks documents protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Defendant and Counterclaim Plaintiff further objects to this Instruction seeking all documents in the possession of "any consultants or experts" because it exceeds the requirements of Va. Sup. Ct. R. 4:1(b)(4), and is therefore overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

14. Defendant and Counterclaim Plaintiff objects to Instruction No. 16 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of

admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A). The Instruction is also cumulative and duplicative of earlier Instructions.

15. Defendant and Counterclaim Plaintiff objects to Instruction No. 17 as vague, ambiguous, and unduly burdensome by seeking to later “expand or supplement” these already-served Requests for Production of Documents.

REQUESTS FOR PRODUCTION

I. All Documents and Communications that refer, reflect, or relate to the “forensic psychological evaluation of Ms. Heard” conducted by Dr. Dawn Hughes and referenced in Your Disclosure of Expert Witnesses.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks raw data from Dr. Hughes, which this Court held in its October 7, 2021 Order could be produced only to Dr. Curry, and that Plaintiff and Counterclaim Defendant’s counsel could not have access to. Defendant and Counterclaim Plaintiff further objects to this Request it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then

authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(A)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. Pursuant to Va. Sup. Ct. R. 4:1(b)(4)(A)(iii) requiring a Court Order, Defendant and Counterclaim Plaintiff is willing to meet and confer with Plaintiff and Counterclaim Defendant on a mutual procedure by which both Defendant and Counterclaim Plaintiff and Plaintiff and Counterclaim Defendant mutually agree on a very limited production of documents, through a mutual Consent Order.

2. All notes and other records of the “forensic psychological evaluation of Ms. Heard” conducted by Dr. Dawn Hughes and referenced in Your Disclosure of Expert Witnesses.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “other records” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks raw data from Dr. Hughes, which this Court held in its

October 7, 2021 Order could be produced only to Dr. Curry, and that Plaintiff and Counterclaim Defendant's counsel could not have access to. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(A)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. Pursuant to Va. Sup. Ct. R. 4:1(b)(4)(A)(iii) requiring a Court Order, Defendant and Counterclaim Plaintiff is willing to meet and confer with Plaintiff and Counterclaim Defendant on a mutual procedure by which both Defendant and Counterclaim Plaintiff and Plaintiff and Counterclaim Defendant mutually agree on a very limited production of documents, through a mutual Consent Order.

3. All Documents relied on by Dr. Dawn Hughes in conducting the "forensic psychological evaluation of Ms. Heard" referenced in Your Disclosure of Expert Witnesses.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request because it seeks raw data from Dr. Hughes, which this Court held in its October 7, 2021 Order could be produced only to Dr. Curry, and that Plaintiff and Counterclaim Defendant's counsel could not have access to. Defendant and Counterclaim Plaintiff further objects to this Request it seeks

documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii). Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. Pursuant to Va. Sup. Ct. R. 4:1(b)(4)(A)(iii) requiring a Court Order, Defendant and Counterclaim Plaintiff is willing to meet and confer with Plaintiff and Counterclaim Defendant on a mutual procedure by which both Defendant and Counterclaim Plaintiff and Plaintiff and Counterclaim Defendant mutually agree on a very limited production of documents, through a mutual Consent Order.

4. All Documents that memorialize, contain, or relate to the tests and test results conducted in connection with the “forensic psychological evaluation of Ms. Heard” referenced in Your Disclosure of Expert Witnesses.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy,

limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks raw data from Dr. Hughes, which this Court held in its October 7, 2021 Order could be produced only to Dr. Curry, and that Plaintiff and Counterclaim Defendant's counsel could not have access to. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. The information requested in this Request for Production has already been ruled on in this Court's October 7, 2021 Order.

5. All Documents that memorialize, refer, reflect, or relate to the "collateral interviews" with Ms. Heard's therapists, including Dr. Bonnie Jacobs and Dr. Connell Cowan, conducted in connection with the "forensic psychological evaluation of Ms. Heard" referenced in Your Disclosure of Expert Witnesses.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not

reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. Pursuant to Va. Sup. Ct. R. 4:1(b)(4)(A)(iii) requiring a Court Order, Defendant and Counterclaim Plaintiff is willing to meet and confer with Plaintiff and Counterclaim Defendant on a mutual procedure by which both Defendant and Counterclaim Plaintiff and Plaintiff and Counterclaim Defendant mutually agree on a very limited production of documents, through a mutual Consent Order.

6. All Documents that memorialize, refer, reflect, or relate to the “collateral interview” with Paige Heard in connection with the “forensic psychological evaluation of Ms. Heard” referenced in Your Disclosure of Expert Witnesses.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this

Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. Pursuant to Va. Sup. Ct. R. 4:1(b)(4)(A)(iii) requiring a Court Order, Defendant and Counterclaim Plaintiff is willing to meet and confer with Plaintiff and Counterclaim Defendant on a mutual procedure by which both Defendant and Counterclaim Plaintiff and Plaintiff and Counterclaim Defendant mutually agree on a very limited production of documents, through a mutual Consent Order.

7. All Documents and Communications prior to the commencement of Your relationship with Mr. Depp that memorialize, refer, reflect, or relate to any diagnosis of You with

any of the mental, emotional, or psychological disorders or harm referred to in Your Disclosure of Expert Witnesses, including without limitation the following: “posttraumatic stress disorder,” “stress, anxiety, nightmares, crying, flashbacks, feeling afraid, emotional numbing, dissociation, struggles with trusting others, significant sleep disruption, relationship and intimacy problems, interpersonal disconnection, hypervigilance, and intense psychological pain.”

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrases “relate to” and “referred to in Your Disclosure of Expert Witness” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request having no date limitation, despite the Court’s October 8, 2021 Order indicating that three years “prior to the alleged traumatic event” was the reasonable time period for medical records.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff’s possession, custody or control. Defendant and Counterclaim Plaintiff further objects to this Request because Defendant and Counterclaim Plaintiff has provided HIPPA releases to Plaintiff and Counterclaim Defendant for medical information relevant to this case and have been sent to Defendant and Counterclaim Plaintiff’s medical providers, and this Request exceeds the scope of the Court’s

August 10, 2020 Order regarding that HIPAA release.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this Request.

8. All Documents and Communications during or after Your relationship with Mr. Depp that memorialize, refer, reflect, or relate to any diagnosis of You with any of the mental, emotional, or psychological disorders or harm referred to in Your Disclosure of Expert Witnesses, including without limitation the following: “posttraumatic stress disorder”; “stress, anxiety, nightmares, crying, flashbacks, feeling afraid, emotional numbing, dissociation, struggles with trusting others, significant sleep disruption, relationship and intimacy problems, interpersonal disconnection, hypervigilance, and intense psychological pain.”

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrases “relate to” and “referred to in Your Disclosure of Expert Witness” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks. is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff’s possession, custody or control. Defendant and Counterclaim Plaintiff further objects to this Request because Defendant and

Counterclaim Plaintiff has provided HIPPA releases to Plaintiff and Counterclaim Defendant for medical information relevant to this case and have been sent to Defendant and Counterclaim Plaintiff's medical providers, and the documents have already been produced, and this Request exceeds the scope of the Court's August 10, 2020 Order regarding that HIPAA release.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

9. All Documents and Communications that memorialize, contain, constitute, refer, reflect, or relate to any psychological or psychiatric evaluation of You prior to meeting Mr. Depp.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrases "constitute" and "relate to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in

controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request in seeking "any psychological or psychiatric evaluation of" Defendant and Counterclaim Plaintiff, as not all psychological or psychiatric evaluation of Defendant and Counterclaim Plaintiff are relevant to this case. For the same reasons, Defendant and Counterclaim Plaintiff further objects to this Request having no date limitation. Defendant and Counterclaim 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. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff's possession, custody or control. Defendant and Counterclaim Plaintiff further objects to this Request because Defendant and Counterclaim Plaintiff has provided HIPAA releases to Plaintiff and Counterclaim Defendant for medical information relevant to this case and have been sent to Defendant and Counterclaim Plaintiff's medical providers, and this Request exceeds the scope of the Court's August 10, 2020 Order regarding that HIPAA release. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request 7.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this

Request.

10. All Documents and Communications that memorialize, contain, constitute, refer, reflect, or relate to any psychological or psychiatric evaluation of You during Your relationship with Mr. Depp.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrases “constitute” “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request in seeking “any psychological or psychiatric evaluation of” Defendant and Counterclaim Plaintiff, as not all psychological or psychiatric evaluation of Defendant and Counterclaim Plaintiff are relevant to this case. For the same reasons, Defendant and Counterclaim Plaintiff further objects to this Request having no date limitation. Defendant and Counterclaim 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. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff’s possession, custody or control. Defendant and Counterclaim Plaintiff further objects to this Request because Defendant and Counterclaim Plaintiff has provided HIPAA releases to Plaintiff and Counterclaim Defendant for medical information relevant to this case and have been sent to Defendant and Counterclaim Plaintiff’s medical providers, and the documents have already been produced, and this Request exceeds the scope of the Court’s August 10, 2020 Order regarding that HIPAA release.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this Request.

11. All Documents and Communications that memorialize, contain, constitute, refer, reflect, or relate to any psychological or psychiatric evaluation of You at any time after You filed for divorce from Mr. Depp.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrases “constitute” “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request in seeking “any psychological or psychiatric evaluation of” Defendant and Counterclaim Plaintiff, as not all psychological or psychiatric evaluation of Defendant and Counterclaim Plaintiff are relevant to this case. For the same reasons, Defendant and Counterclaim Plaintiff further objects to this Request having no date limitation. Defendant and Counterclaim 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.

Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff's possession, custody or control. Defendant and Counterclaim Plaintiff further objects to this Request because Defendant and Counterclaim Plaintiff has provided HIPAA releases to Plaintiff and Counterclaim Defendant for medical information relevant to this case and have been sent to Defendant and Counterclaim Plaintiff's medical providers, and the documents have already been produced, and this Request exceeds the scope of the Court's August 10, 2020 Order regarding that HIPAA release.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this Request.

12. All Documents and Communications that evidence, refer, reflect, or relate to any physical, mental, or other abuse You have suffered at the hands of any other Person, including but not limited to the "abuse at a very young age" referenced by You in the Op-Ed.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase "relate to." on the grounds that it is vague, ambiguous, and fails to define with

particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it exceeds the scope of the Court's August 10, 2020 Order regarding Defendant and Counterclaim Plaintiff's HIPAA release, and exceeds the scope of the Court's October 8, 2021 Order.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this Request.

13. All Documents and Communications that evidence, refer, reflect, or relate to any physical, mental, or emotional injuries You have ever sustained as a result of any physical, mental, or other abuse at the hands of any other Person, including but not limited to the "abuse at a very young age" referenced by You in the Op-Ed.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request. including the phrase "relate to," on the grounds that it is vague, ambiguous, and fails to define with

particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it exceeds the scope of the Court's August 10, 2020 Order regarding Defendant and Counterclaim Plaintiff's HIPAA release, and exceeds the scope of the Court's October 8, 2021 Order.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this Request.

14. All Documents and Communications that evidence, refer, reflect, or relate to any diagnosis of You with any physical, mental, or emotional disorder or harm in connection with any abuse by any other Person (including but not limited to the "abuse at a very young age" referenced by You in the Op-Ed), to include without limitation any diagnosis of Post-Traumatic Stress Disorder.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the

phrase “relate to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request in seeking “any physical, mental, or emotional disorder of” Defendant and Counterclaim Plaintiff, as not all physical, mental, or emotional disorders of Defendant and Counterclaim Plaintiff are relevant to this case. For the same reasons, Defendant and Counterclaim Plaintiff further objects to this Request having no date limitation. Defendant and Counterclaim Plaintiff further objects to this Request because it exceeds the scope of the Court’s August 10, 2020 Order regarding Defendant and Counterclaim Plaintiff’s HIPAA release. Defendant and Counterclaim 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. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff’s possession, custody or control. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work

product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this Request.

15. All Documents and Communications that evidence, refer, reflect, or relate to any treatment You have ever received for any mental or emotional harm in connection with any abuse by any other Person (including but not limited to the “abuse at a very young age” referenced by You in the Op-Ed), including but not limited to any diagnosis of Post-Traumatic Stress Disorder.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request in seeking “any mental or emotional harm in connection with any abuse by any other Person” of Defendant and Counterclaim Plaintiff, as not all mental or emotional harm in connection with any abuse by any other Person of Defendant and Counterclaim Plaintiff is relevant to this case. For the same reasons, Defendant and Counterclaim Plaintiff further objects to this Request having no date limitation. Defendant and Counterclaim Plaintiff further objects to this Request because it exceeds the scope of the Court’s August 10, 2020 Order regarding Defendant and Counterclaim Plaintiff’s HIPAA release. Defendant and Counterclaim 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. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff's possession, custody or control.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this Request.

16. All Documents and Communications that refer, reflect, or relate to any treatment of You by any therapist, including without limitation Dr. Bonnie Jacobs and Dr. Connell Cowan.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase "relate to," on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks. is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in

resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request in seeking “any treatment of You by any therapist” for all of time, as not all therapy of Defendant and Counterclaim Plaintiff is relevant to this case. For the same reasons, Defendant and Counterclaim Plaintiff further objects to this Request having no date limitation. Defendant and Counterclaim 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. Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff’s possession, custody or control. Defendant and Counterclaim Plaintiff further objects to this Request because Defendant and Counterclaim Plaintiff has provided HIPPA releases to Plaintiff and Counterclaim Defendant for medical information relevant to this case and have been sent to Defendant and Counterclaim Plaintiff’s medical providers, and the documents have already been produced, and this Request exceeds the scope of the Court’s August 10, 2020 Order regarding that HIPAA release. Defendant and Counterclaim Plaintiff further objects to this Request to the extent it seeks discovery of expert information through a document request, but absent a Court Order discovery of facts known and opinions held by experts is only authorized through Interrogatories and depositions as provided in Va. Sup. Ct. R. 4:1(b)(4).

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this Request.

17. All Documents and Communications (including Documents and Communications prior to, during, or after Your relationship with Mr. Depp) that refer, reflect, or relate to any treatment for mental health issues, including prescription and management of psychotropic medication by any provider; emergency room, urgent care, or other physician/nurse/EMT encounters related to self-harming behavior and/or attempted suicide, drug or alcohol consumption, or physiological symptoms of panic or anxiety (including any of the following: exhaustion, dissociation, feelings of unreality or of being disconnected from one's body, racing heart or heart palpitations, chest pain, extreme fear, confusion, acute muscle pain or cramping, temporary paralysis, numbness in any extremities, sudden sensations of hot or cold, shooting pains, shaking, sweating, dizziness, lightheadedness and/or fainting); therapy services provided on an individual, couples or group basis; church or faith-based counseling; psychiatric holds (5150, etc.) at any hospital or other facility; participation for any amount of time in intensive outpatient programming, partial hospitalization programming, or residential treatment programming of You, carried out by any provider (counselor, clergy, therapist, social worker, psychiatrist, nurse, nurse practitioner, or other physician).

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase "relate to," on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. For the same reasons, Defendant and Counterclaim Plaintiff further objects to the phrases "therapy services provided on an individual, couples, or group basis; church or faith based counseling," and "clergy" of this Request. Defendant and Counterclaim Plaintiff further objects to this Request seeking documents for all of time and having no date limitation. Defendant and Counterclaim 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. Defendant and Counterclaim Plaintiff

further objects to this Request on the grounds that it seeks documents that are not within Defendant and Counterclaim Plaintiff's possession, custody or control. Defendant and Counterclaim Plaintiff further objects to this Request because Defendant and Counterclaim Plaintiff has provided HIPPA releases to Plaintiff and Counterclaim Defendant for medical information relevant to this case and have been sent to Defendant and Counterclaim Plaintiff's medical providers, and the documents have already been produced, and this Request exceeds the scope of the Court's August 10, 2020 Order regarding that HIPAA release. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this Request.

18. All Documents and Communications reflecting or relating to the raw data associated with the "forensic psychological evaluation" of Ms. Heard referenced in Your Disclosure of Expert Witnesses and sought by Mr. Depp via the Order on Mr. Depp's Motion to Compel an Independent Examination of Ms. Heard, a copy of which is attached as Exhibit "1."

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the

phrase “relate to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff objects to this Request because it seeks raw data from Dr. Hughes, which this Court held in its October 7, 2021 Order could be produced only to Dr. Curry, and that Plaintiff and Counterclaim Defendant’s counsel could not have access to. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects on the grounds that there is no Exhibit 1 attached to the Requests.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Defendant and Counterclaim Plaintiff stands on her objections to this Request.

19. All Documents and Communications that evidence or reflect any loss of income

You have incurred as a result of any conduct by Mr. Depp and/or Adam Waldman alleged in Your Counterclaim.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request seeking financial information on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case. On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case." Also on September 18, 2020 the Court specifically defined the

narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income...The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case. These Orders should apply the same to these Requests for Production to Defendant and Counterclaim Plaintiff. Defendant and Counterclaim Plaintiff further objects to this Request it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request, including based on its referral to the entire Counterclaim within one Request, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request

invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has already produced documents related to her damages in the Counterclaims. Defendant and Counterclaim Plaintiff stands on her objections to this vague, overbroad and unduly burdensome Request.

20. All Documents that evidence or reflect any “press requests,” as that term is used in Your Disclosure of Expert Witnesses, from January 1, 2010 through and including the present.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request

invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. Pursuant to Va. Sup. Ct. R. 4:1(b)(4)(A)(iii) requiring a Court Order, Defendant and Counterclaim Plaintiff is willing to meet and confer with Plaintiff and Counterclaim Defendant on a mutual procedure by which both Defendant and Counterclaim Plaintiff and Plaintiff and Counterclaim Defendant mutually agree on a very limited production of documents, through a mutual Consent Order.

21. All Documents and Communications that evidence or reflect any “endorsement deals” (as that term is used in Your Disclosure of Expert Witnesses) You have entered into from January 1, 2010 through and including the present.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under

Va. Sup. Ct. R. 4:1(b)(4)(iii).

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the amount of income" from the tax returns is relevant and that only involved "limited parts of [the tax return] that would show the income." The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the "return pages" of tax returns needed to be produced, and "the supplementary documents that are attached to" the returns were beyond the

scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. Pursuant to Va. Sup. Ct. R. 4:1(b)(4)(A)(iii) requiring a Court Order, Defendant and Counterclaim Plaintiff is willing to meet and confer with Plaintiff and Counterclaim Defendant on a mutual procedure by which both Defendant and Counterclaim Plaintiff and Plaintiff and Counterclaim Defendant mutually agree on a very limited production of documents, through a mutual Consent Order. Defendant and Counterclaim Plaintiff is further willing to meet and confer with Plaintiff and Counterclaim Defendant regarding the scope of this overbroad and unduly burdensome Request.

22. All Documents that support, evidence, or reflect any of the “lost career opportunities” referenced in Your Disclosure of Expert Witnesses.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks. is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources.

and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections and pursuant to Va. Sup. Ct. R. 4:1(b)(4), Defendant and Counterclaim Plaintiff stands on her objections to this Request. Pursuant to Va. Sup. Ct. R. 4:1(b)(4)(A)(iii) requiring a Court Order, Defendant and Counterclaim Plaintiff is willing to meet and confer with Plaintiff and Counterclaim Defendant on a mutual procedure by which both Defendant and Counterclaim Plaintiff and Plaintiff and Counterclaim Defendant mutually agree on a very limited production of documents, through a mutual Consent Order. Defendant and Counterclaim Plaintiff is further willing to meet and confer with Plaintiff and Counterclaim Defendant regarding the scope of this overbroad and unduly burdensome Request.

23. All Documents evidencing Your compensation from any endorsement deals, including without limitation any agreements with L’Oreal.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the

grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request it seeks documents that have already been produced.

Defendant and Counterclaim Plaintiff further objects to this Request seeking financial information on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope

of discovery in this case unless these individuals were “going to be potential witnesses” in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking financial related documents during the parties’ marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring “the documents which show the gross income...The supporting documents are not to be produced,” and further Ordered that only “the amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard’s 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp’s finances were “overly broad [and] burdensome,” and therefore beyond the scope of discovery in this case. These Orders should apply the same to these Requests for Production to Defendant and Counterclaim Plaintiff.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request, except that she has produced her contract(s) with L'Oreal and documents within the scope of the Court's Orders regarding tax-return discovery.

24. All Documents evidencing Your compensation from any endorsement deals, including without limitation any agreements with L'Oreal.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced.

Defendant and Counterclaim Plaintiff further objects to this Request seeking financial information on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks

information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On July 24, 2020 the Court ruled that Request No. 14 of Ms. Heard's 2nd Request for Documents seeking "income from all sources from 2010 to the present" was overbroad because "those types of things aren't anything that would be helpful in this case," along with ruling that discovery seeking "outflow, what his expenses are and whether he spends more money than he makes" was overbroad and beyond the scope of relevant discovery in this case. The Court also ruled that Request 16 of Ms. Heard's 2nd Request for Documents seeking all transactions from January 1, 2010 to the present with a list of individuals was "overly broad" and beyond the scope of discovery in this case unless these individuals were "going to be potential witnesses" in the case.

On September 18, 2020 the Court ruled that Request Nos. 1-6 and 8 of Ms. Heard's 7th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard's 7th Requests seeking financial related documents during the parties' marriage and related to the divorce case was overbroad and beyond the scope of relevant discovery in this case because "its denied under the doctrine of enough is enough. You all have been through the divorce already. We're not going to retry that divorce in this case."

Also on September 18, 2020 the Court specifically defined the narrow scope of relevant tax-return discovery in this case as only requiring "the documents which show the gross income...The supporting documents are not to be produced," and further Ordered that only "the

amount of income” from the tax returns is relevant and that only involved “limited parts of [the tax return] that would show the income.” The Court reiterated this scope of tax-return discovery on November 20 when it further ruled that only the “return pages” of tax returns needed to be produced, and “the supplementary documents that are attached to” the returns were beyond the scope of relevant discovery in this case. Any other tax-related documents are therefore beyond the scope of relevant discovery in this case.

On November 20, 2020 the Court also ruled that Requests 1-5 of Ms. Heard’s 8th Requests for Documents seeking deposition transcripts, pleadings, discovery responses, and document production from four other specific litigations regarding disputes over Mr. Depp’s finances were “overly broad [and] burdensome,” and therefore beyond the scope of discovery in this case. These Orders should apply the same to these Requests for Production to Defendant and Counterclaim Plaintiff.

Defendant and Counterclaim Plaintiff objects to this Request because it is unreasonably cumulative and duplicative of other discovery issued by the Plaintiff and Counterclaim Defendant. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her

objections to this Request, except that she has produced her contract(s) with L'Oreal and documents within the scope of the Court's Orders regarding tax-return discovery.

25. All Documents that support, reflect, or relate to Your contention that You have "received critical and box office acclaim," as stated in Your Disclosure of Expert Witnesses.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase "relate to," of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite

showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

26. All Documents that contain, constitute, refer, reflect, or relate to any reviews of You or Your performance in any film or television program, from January 1, 2010 through and including the present.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrases “constitute” and “relate to,” on the grounds that they are vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

27. All Documents that memorialize, refer, reflect, or relate to the financial success or failure of any film or television program in which You have given a performance, from January 1, 2010 through and including the present.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that

Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request. Defendant and Counterclaim Plaintiff stands on her objections to this Request.

28. All Documents and Communications that discuss, mention, or relate to any of the eight statements that form the basis of Your Counterclaim for defamation.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase "relate to," on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff further objects because Plaintiff and Counterclaim Defendant has repeatedly taken the position in response to Defendant and Counterclaim Plaintiff's Requests that it will only produce documents related to the statements forming the basis of the Counterclaim for defamation that survived *demurrer* and are going to trial- Plaintiff and Counterclaim Defendant cannot have it both ways. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

29. All Communications between You and anyone acting on Your behalf, on the one hand, and any actual or potential source of employment or income, on the other hand (including without limitation film studios), related to any of the eight statements that form the basis of Your Counterclaim for defamation.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff further objects because Plaintiff and Counterclaim Defendant has repeatedly taken the position in response to Defendant

and Counterclaim Plaintiff's Requests that it will only produce documents related to the statements forming the basis of the Counterclaim for defamation that survived *demurrer* and are going to trial- Plaintiff and Counterclaim Defendant cannot have it both ways. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks discovery of expert information through a document request, which is not permitted absent a Court Order, after finding good reason and then authorizing only very limited discovery under Va. Sup. Ct. R. 4:1(b)(4)(iii).

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

30. All Communications between You and anyone acting on Your behalf, on the one hand, and any actual or potential source of employment or income, on the other hand (including without limitation film studios), related to Mr. Depp's Complaint and allegations in this Action.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request. including the phrase "relate to," on the grounds that it is vague, ambiguous, and fails to define with

particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Plaintiff is not aware of any documents responsive to this Request.

31. All Communications between You and anyone acting on Your behalf, on the one hand, and any actual or potential source of employment or income, on the other hand (including without limitation film studios), related to Mr. Depp's allegations in the U.K. Action.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase "relate to," on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the

amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced.

Defendant and Counterclaim Plaintiff further objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, and is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, and critically the Court's prior rulings defining the scope of relevant discovery in this case quoted in detail below.

On November 20, 2020 the Court ruled that discovery seeking documents "sufficient to reflect the impact" of the UK litigation "on Mr. Depp's reputation and career" was overly broad, unduly burdensome, and unreasonably vague, and therefore beyond the scope of discovery in this case. On December 18, 2020 the Court ruled that Request No. 23 of Mr. Depp's 1st Requests for Documents and Request 50 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications between Ms. Heard and The Sun/NGN was overbroad, and therefore beyond the scope of relevant discovery in this case. The Court also ruled that Request No. 51 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to the UK Action was also overbroad, and therefore beyond the scope of discovery in this case.

These Orders should apply the same to these Requests for Production to Defendant and Counterclaim Plaintiff.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

32. All Communications between You and anyone acting on Your behalf, on the one hand, and any actual or potential source of employment or income, on the other hand (including without limitation film studios), related to Adam Waldman.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase "relate to," on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff further objects to this

Request as it seeks documents that have already been produced.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this vague, overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

33. All Communications concerning Your relationship with Mr. Depp between You, on the one hand, and any of the following Persons, on the other hand, from January 1, 2014 through and including the present: Whitney Henriquez, iO Tillett Wright, Raquel Pennington, Kristina Sexton, Amanda de Cadenet, and Joshua Drew.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks. is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced.

This Request is also overbroad and unduly burdensome to the point of harassment, is not calculated to lead to the discovery of information relevant to the subject matter of this action, and seeks information related to matters beyond the scope of the asserted claims and defenses in this suit because on December 18, 2020, the Fairfax County Circuit Court ruled that Request 43 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore held that Request and this Request are beyond the scope of discovery in this case. The Fairfax County Circuit Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore held that Request and this Request are beyond the scope of discovery in this case. These Orders should apply the same to these Requests for Production to Defendant and Counterclaim Plaintiff.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request. Defendant and Counterclaim Plaintiff stands on her objections to this Request.

November 24, 2021

AS TO OBJECTIONS:



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CERTIFICATE OF SERVICE

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

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Defendant John C. Depp, II*



Elaine Charlson Bredehoft

EXHIBIT 3

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

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

**DEFENDANT AND COUNTERCLAIM PLAINTIFF AMBER LAURA HEARD'S
OBJECTIONS AND RESPONSES TO PLAINTIFF AND COUNTERCLAIM
DEFENDANT'S ELEVENTH SET OF REQUESTS FOR PRODUCTION**

Pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia ("Rules"), Defendant and Counterclaim Plaintiff Amber Laura Heard, by and through her attorneys, submits these objections and responses (the "Responses") to Plaintiff and Counterclaim Defendant John C. Depp, II's Eleventh Set of Requests for Production dated November 3, 2021 (the "Requests").

GENERAL OBJECTIONS

The following general objections and responses (the "General Objections") are incorporated into each specific objection and response (the "Specific Objections") as if fully set forth therein:

1. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they are duplicative, cumulative, or seek documents that have already been provided through other means of discovery. Defendant and Counterclaim Plaintiff will not reproduce documents already produced in discovery.

2. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they are vague, ambiguous, overly broad, unduly burdensome, seek documents not relevant to the claims or defenses of any party, or are not proportional to the needs of the case.

3. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they impose any obligations or requirements beyond the scope of the Rules or any case law interpreting them.

4. Defendant and Counterclaim Plaintiff's Responses are not intended to be and shall not be construed as an agreement or concurrence that all documents and information provided are admissible with respect to the claims and defenses of Plaintiff and Counterclaim Defendant and/or Defendant and Counterclaim Plaintiff.

5. Defendant and Counterclaim Plaintiff objects to each Request to the extent that it calls for documents and information that: (a) may be derived or ascertained from documents that have been or will be produced in this action; (b) are already in Plaintiff and Counterclaim Defendant's possession, custody, or control; (c) are publicly available; or (d) are otherwise independently available to Plaintiff and Counterclaim Defendant or his counsel.

6. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they purport to call for documents or information that: (a) are subject to the attorney-client privilege; (b) constitute attorney work product; (c) are protected from disclosure based on common interest or a similar privilege; or (d) are otherwise protected from disclosure under an applicable privilege, law, or rule. Defendant and Counterclaim Plaintiff will not produce such documents and information in response to the Requests, and any inadvertent production thereof shall not be deemed a waiver of any privilege with respect to such documents and information.

7. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they require unreasonable or unduly burdensome measures to locate and produce responsive documents. Defendant and Counterclaim Plaintiff will construe the Requests to require a reasonable and diligent search of reasonably-accessible files within her possession, custody, or control where she would reasonably expect to find information, documents, or things related to the Requests.

8. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they seek documents and information that are not within Defendant and Counterclaim Plaintiff's possession, custody, or control. Subject to this General Objection, in responding to the Requests, Defendant and Counterclaim Plaintiff will provide only responsive documents within Defendant and Counterclaim Plaintiff's possession, custody, or control.

9. Defendant and Counterclaim Plaintiff objects to the Definitions and Instructions to the extent they seek to impose obligations greater than those imposed by the Rules or any other applicable law, rule, ruling of this court, or agreement of the parties.

10. Defendant and Counterclaim Plaintiff objects to the Requests to the extent they are based on a false premise and contain express or implied assumptions of fact or law with respect to matters at issue in this case. Defendant and Counterclaim Plaintiff's Responses to the Requests are not intended to be and shall not be construed as an agreement or concurrence with Plaintiff and Counterclaim Defendant's characterization of any facts, circumstances, or legal obligations. Defendant and Counterclaim Plaintiff reserves the right to contest any such characterization as inaccurate.

11. Defendant and Counterclaim Plaintiff expressly reserves all rights and privileges under the Rules and any other applicable law or rule. The failure to assert such rights and

privileges or the inadvertent disclosure by Defendant and Counterclaim Plaintiff of information or documents protected by such rights or privileges shall not constitute a waiver thereof, either with respect to these Responses or with respect to any future discovery objections or responses. Defendant and Counterclaim Plaintiff's Responses to the Requests are made to the best of her present knowledge, information, and belief. These Responses are at all times subject to such additional or different documents and information that discovery or further investigation may disclose and, while based on the present state of Defendant and Counterclaim Plaintiff's knowledge and investigation, are subject to such additional knowledge of facts as may result from Defendant and Counterclaim Plaintiff's further discovery or investigation.

OBJECTIONS TO DEFINITIONS

1. Defendant and Counterclaim Plaintiff objects to Definition No. 2 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation to the extent it seeks documents beyond the scope of Va. Sup. Ct. R. 4:9(a). Since a "Chat Application" is a form of a "Document," Defendant and Counterclaim Plaintiff will interpret the phrase "Chat Application" in accordance with the definition included in Va. Sup. Ct. R. 4:9(a).

2. Defendant and Counterclaim Plaintiff objects to Definition No. 3 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties'

resources, and the importance of the discovery in resolving the issues at stake in the litigation to the extent it seeks documents beyond the scope of Va. Sup. Ct. R. 4:9(a). Since a “Communication” is a form of a “Document.” Defendant and Counterclaim Plaintiff will interpret the word “Communication” in accordance with the definition included in Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff further objects to this Definition to the extent it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Definition invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

3. Defendant and Counterclaim Plaintiff objects to Definition No. 4 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in the litigation. On September 18, 2020, the Fairfax County Circuit Court ruled that Request Nos. 1-6 and 8 of Ms. Heard’s 6th Requests for Documents and Request Nos. 1, 3, 5, and 7 of Ms. Heard’s 7th Requests seeking documents during the parties’ marriage and related to the divorce litigation was overbroad and beyond the scope of relevant discovery in this case because “its denied under the doctrine of enough is enough. You all have been through the divorce already. We’re not going to retry that divorce in this case.”

4. Defendant and Counterclaim Plaintiff objects to Definition No. 5 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to

lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation to the extent it seeks documents beyond the scope of Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff will interpret the word "Document" in accordance with the definition included in Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff further objects to this Definition to the extent it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Definition invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

5. Defendant and Counterclaim Plaintiff objects to Definition No. 7 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, and because it seeks documents outside of Defendant and Counterclaim Plaintiff's possession, custody, or control. Defendant and Counterclaim Plaintiff further objects to this Definition to the extent it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Definition invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

6. Defendant and Counterclaim Plaintiff objects to Definition No. 10 on the grounds that it is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation, including because on November 20, 2020, the Fairfax County Circuit Court ruled that discovery seeking documents "sufficient to reflect the impact" of the UK litigation "on Mr. Depp's reputation and career" was overly broad, unduly burdensome, and unreasonably vague, and therefore held that those Requests and this Request are beyond the scope of discovery in this case. And on December 18, 2020 the Fairfax County Circuit Court ruled that Request No. 23 of Mr. Depp's 2nd Requests for Document and Request 50 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications between Ms. Heard and The Sun/NGN was overbroad, and therefore held that Request and this Request are beyond the scope of discovery in this case. The Court also ruled that Request No. 51 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to the UK Action was also overbroad. Additionally, Mr. Depp repeatedly took the position in his Opposition to Ms. Heard's Supplemental Plea in Bar that this Action and the U.K. Action did not arise from the same transaction or occurrence.

7. Defendant and Counterclaim Plaintiff objects to Definition No. 12 as vague, ambiguous, and failing to define with particularity the documents and information that it seeks, as it defines words in a circular, confusing, and non-specific manner, and is therefore overly broad and unduly burdensome.

8. Defendant and Counterclaim Plaintiff objects to Definition No. 13 as vague,

ambiguous, and failing to define with particularity the documents and information that it seeks, and is therefore overly broad and unduly burdensome, as it attempts to define non-specific words, terms, and phrases without providing any such definition.

OBJECTIONS TO INSTRUCTIONS

1. Defendant and Counterclaim Plaintiff objects to Instruction No. 1 to the extent it exceeds the requirements of Va. Sup. Ct. R. 4:9(a), which only requires the production of documents “which are in the possession, custody, or control of the party upon whom the request is served,” and is therefore overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents in accordance with Va. Sup. Ct. R. 4:9(a). Defendant and Counterclaim Plaintiff further objects to this Instruction to the extent it seeks documents and information protected by the attorney-client privilege, and on the grounds that this Instruction invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

2. Defendant and Counterclaim Plaintiff objects to the portion of Instruction No. 3 seeking “The date such additional documents came into your possession shall be specified, as well as the identity of the individuals who furnished such additional documents to the person preparing the response” because it exceeds the requirements of Va. Sup. Ct. R 4:9 by requesting substantive information in a response to a Request for Production of Documents, and is therefore overly broad, unduly burdensome. and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

3. Defendant and Counterclaim Plaintiff objects to Instruction No. 4 because the request to “specify the reason(s) for your inability to respond to the remainder and stating whether information or knowledge you have concerning the portion to which you do not respond” exceeds the requirements of Va. Sup. Ct. R 4:9 by requesting substantive information in a response to a Request for Production of Documents, and is therefore overly broad, unduly burdensome, and seeks documents and information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

4. Defendant and Counterclaim Plaintiff objects to Instruction Nos. 5(b) and (c) because the requests to identify each document in the manner requested and to “provide a description of the subject matter of each document or item” exceed the requirements of Va. Sup. Ct. Rs 4:9 and 4:1(b)(6) by requesting substantive information in a response to a Request for Production of Documents, and are therefore overly broad, unduly burdensome, and seek documents and information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

5. Defendant and Counterclaim Plaintiff objects to Instruction No. 6 as unduly burdensome because the Defendant and Counterclaim Plaintiff has an ongoing duty under Va. Sup. Ct. R. 4:1(e) to supplement document production and responses when and where necessary, and this instruction is therefore overly broad and unduly burdensome. Defendant and Counterclaim Plaintiff further objects to this Instruction because by its plain language of “no documents in existence” it seeks for Defendant and Counterclaim Plaintiff to respond regarding documents anywhere “in existence” that are outside of Defendant and Counterclaim Plaintiff’s possession, custody, or control.

6. Defendant and Counterclaim Plaintiff objects to Instruction No. 7 to the extent it

seeks documents and information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court.

7. Defendant and Counterclaim Plaintiff objects to Instruction No. 8 because it exceeds the requirements of Va. Sup. Ct. R 4:9 by requesting substantive information in a response to a Request for Production of Documents, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

8. Defendant and Counterclaim Plaintiff objects to Instruction No. 9 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks documents and information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A).

9. Defendant and Counterclaim Plaintiff objects to Instruction No. 10 seeking “transmittal sheets and cover letters” on the grounds that the request for such documents is overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff further objects to the extent this Instruction seeks documents protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme

Court.

10. Defendant and Counterclaim Plaintiff objects to Instruction No. 11 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information and documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A).

11. Defendant and Counterclaim Plaintiff objects to Instruction No. 12 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks documents and information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A). The Instruction is also ambiguous because it contradicts Instruction No. 9. Defendant and Counterclaim Plaintiff further objects to this instruction because a request to access, extract, inspect, and/or test Defendant and Counterclaim Plaintiff's devices raises significant issues of confidentiality and privacy, is subject to the balancing required by Va. Sup. Ct. R. 4:1(b)(1), and requires a heightened showing of relevance and discoverability that Plaintiff and Counterclaim Defendant has not demonstrated in this case. Such a request does not create a routine right of direct access to a party's electronic information and devices, as Courts guard against undue intrusiveness, undue burden, and significant overbreadth that results from the requested type of access, extraction, inspection, and/or testing. Additionally, Plaintiff and Counterclaim Defendant's UK Counsel confirmed on July 17, 2020 that Plaintiff and Counterclaim Defendant did not dispute the accuracy of the accompanying

date/time metadata to the May 2016 images, and further that any analysis of digital images will not yield any additional information than what can be seen from the images. For all of these reasons, Defendant and Counterclaim Plaintiff objects to this Instruction as overly broad, unduly burdensome, harassing, and seeking information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in the litigation.

12. Defendant and Counterclaim Plaintiff objects to Instruction Nos. 13 and 14 on the grounds that they exceed the requirements of Va. Sup. Ct. R 4:9 and 4:1(b)(6), and are therefore overly broad, unduly burdensome, and seek information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

13. Defendant and Counterclaim Plaintiff objects to Instruction No. 15 because it seeks documents protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Defendant and Counterclaim Plaintiff further objects to this Instruction seeking all documents in the possession of "any consultants or experts" because it exceeds the requirements of Va. Sup. Ct. R. 4:1(b)(4), and is therefore overly broad, unduly burdensome, and seeks documents not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case.

14. Defendant and Counterclaim Plaintiff objects to Instruction No. 16 on the grounds that it exceeds the requirements of Va. Sup. Ct. R 4:9, and is therefore overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of

admissible evidence regarding the claims and defenses in this case. Defendant and Counterclaim Plaintiff will produce documents as they are kept in the usual course of business pursuant to Va. Sup. Ct. R. 4:9(b)(iii)(A). The Instruction is also cumulative and duplicative of earlier Instructions.

15. Defendant and Counterclaim Plaintiff objects to Instruction No. 17 as vague, ambiguous, and unduly burdensome by seeking to later “expand or supplement” these already-served Requests for Production of Documents.

REQUESTS FOR PRODUCTION

1. All Documents and Communications that refer, reflect, or relate to the “first violent incident” described in Your Witness Statement at paragraphs 44-51.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff's Witness Statement referred to in this Request, if any.

2. All Documents and Communications that refer, reflect, or relate to the "Painting incident, March 2013" described in Your Witness Statement at paragraphs 52-64.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff's Witness Statement referred to in this Request, if any.

3. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp on March 8, 2013 (i.e., the date of the “Painting incident, March 2013,” referenced in Your Witness Statement at paragraphs 52-64).

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate in any way to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 2. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that mention or refer to the Painting incident, March 2013, if any.

4. All Communications concerning Your relationship with Mr. Depp, from and after January 1, 2014, between or among You, on the one hand, and any of the following Persons on the other hand: Whitney Henriquez, Raquel Pennington, Kristina Sexton, Amanda de

Cadenet, iO Tillet Wright, Joshua Drew, Paige Heard, and/or David Heard.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive.

This Request is also overbroad and unduly burdensome to the point of harassment, is not calculated to lead to the discovery of information relevant to the subject matter of this action, and seeks information related to matters beyond the scope of the asserted claims and defenses in this suit because on December 18, 2020, the Fairfax County Circuit Court ruled that Request 43 of Mr. Depp’s 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp’s conduct was overbroad, and therefore held that Request and this Request are beyond the scope of discovery in this case. The Fairfax County Circuit Court also ruled that Request 52 of Mr. Depp’s 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard’s “relationship with Mr. Depp” was also overbroad, and therefore held that Request and this Request are beyond the scope of discovery in this case. These Orders should apply the same to

these Requests for Production to Defendant and Counterclaim Plaintiff.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

5. All Documents and Communications that refer, reflect, or relate to the “Boston-LA flight, 24 May 2014” referenced in Your Witness Statement at paragraphs 65-83.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which

is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff's Witness Statement referred to in this Request, if any.

6. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp on May 24, 2014 (i.e., the date of "Boston-LA flight" referenced in Your Witness Statement at paragraphs 65-83).

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate in any way to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 5. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that mention or refer to the Boston-LA flight, 24 May 2014, if any.

7. All Documents and Communications that refer, reflect, or relate to the alleged incident in the “Bahamas, August 2014” referenced in Your Witness Statement at paragraphs 84-92.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff’s Witness Statement referred to in this Request, if any.

8. All Communications between You and Debbie Lloyd during Your stay in the “Bahamas, August 2014” referenced in Your Witness Statement at paragraphs 84-92.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control responsive to this Request, if any.

9. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp during Your stay in the “Bahamas, August 2014” referenced in Your Witness Statement at paragraphs 84-92.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate in any way to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 8. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information

protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that mention or refer to Mr. Depp during Defendant and Counterclaim Plaintiff's stay in the Bahamas in August 2014, if any.

10. All Documents and Communications that refer, reflect, or relate to the alleged incident in "Tokyo, January 2015" referenced in Your Witness Statement at paragraphs 94-96.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff's Witness Statement referred to in this Request, if any.

11. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp during Your stay in Tokyo referenced in Your Witness Statement at paragraphs 94-96.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate in any way to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 10. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product

documents in her possession, custody, and control that mention or refer to the incident in Tokyo in January 2015, if any.

12. All Communications between or among You, Whitney Henriquez, iO Tillett Wright, Amanda de Cadenet, Kristina Sexton, Joshua Drew, Paige Heard, or David Heard regarding Your engagement or wedding to Mr. Depp.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “Your engagement or wedding to Mr. Depp, on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request. Defendant and Counterclaim Plaintiff stands on her objections to this Request.

13. All Documents and Communications that refer, reflect, or relate to the alleged incident at the “Wedding” referenced in Your Witness Statement at paragraphs 97-98.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff’s Witness Statement referred to in this Request. if any.

14. All Documents and Communications that refer, reflect, or relate to the alleged incident in “Australia, March 2015” referenced in Your Witness Statement at paragraphs 99-130.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and

defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff's Witness Statement referred to in this Request, if any.

15. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp during Your stay in Australia referenced in Your Witness Statement at paragraphs 99-130.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate in any way to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and

Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 14. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that mention or refer to the incident in Australia in March 2015, if any.

16. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp within ten days after You returned from Your stay in Australia referenced in Your Witness Statement at paragraphs 99-130.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate in any way to” and the time period stated in this Request, on the grounds that they are vague, ambiguous, and fail to define with particularity the information that they seek, are overly broad, unduly burdensome, and seek information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request

invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

17. All photographs taken on any of Your devices during Your stay in Australia referenced in Your Witness Statement at paragraphs 99-130.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the undefined word “devices” in this Request as vague, ambiguous, and failing to define with particularity the information that it seeks. Defendant and Counterclaim Plaintiff objects to this Request, on the grounds that is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation, in that it seeks all photographs no matter the subject matter. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce any photographs in her possession, custody, and control of the incidents in Australia between March 3-5, 2015, if any.

18. All Documents and Communications that refer, reflect, or relate to the “Staircase

incident, March 2015,” referenced in Your Witness Statement at paragraphs 131-134.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff’s Witness Statement referred to in this Request, if any.

19. All Communications between You and Whitney Henriquez on the date of the “Staircase incident” referenced in Your Witness Statement at paragraphs 131-134.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request having no limitations on subject matter and on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks. is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence

regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 18.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the "Staircase Incident" referenced in this Request, if any.

20. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp on the date of the "Staircase incident" referenced in Your witness Statement at paragraphs 131-134.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate in any way to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 18. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request

invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that mention or refer to the Staircase Incident, if any.

21. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp within ten days after the date of the “Staircase incident” referenced in Your witness Statement at paragraphs 131-134.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate in any way to” and the time period stated in this Request, on the grounds that they are vague, ambiguous, and fail to define with particularity the information that they seek, are overly broad, unduly burdensome, and seek information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite

showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

22. All Documents and Communications that refer, reflect, or relate to the incident on the “Malaysia train, August 2015” referenced in Your Witness Statement at paragraph 135.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of

Defendant and Counterclaim Plaintiff's Witness Statement referred to in this Request, if any.

23. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp within on the date of the alleged incident on the "Malaysia train, August 2015" referenced in Your witness Statement at paragraph 135.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate in any way to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 22. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that mention or refer to the Malaysia train Incident, if any.

24. All Documents and Communications that refer, reflect, or relate to the alleged incident in "Los Angeles, November 2015" referenced in Your Witness Statement at

paragraph 136.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff’s Witness Statement referred to in this Request, if any.

25. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp within ten days after the date of the alleged incident in “Los Angeles, November 2015” referenced in Your Witness Statement at paragraph 136.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate in any way to” and the time period stated in this Request, on the grounds that they are vague, ambiguous, and fail to define with particularity the information that they seek,

are overly broad, unduly burdensome, and seek information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

26. All Documents and Communications that refer, reflect, or relate to the alleged incident “on the night of 15 December 2015” referenced in Your Witness Statement at paragraphs 137-147.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues

at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff's Witness Statement referred to in this Request, if any.

27. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp on the date of the alleged incident on December 15, 2015 referenced in Your Witness Statement at paragraphs 137-147.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase "relate in any way to" of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 26. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks

information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that mention or refer to the incident on December 15, 2015, if any.

28. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp within ten days after the date of the alleged incident on December 15, 2015 referenced in Your Witness Statement at paragraphs 137-147.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate in any way to” and the time period stated in this Request, on the grounds that they are vague, ambiguous, and fail to define with particularity the information that they seek, are overly broad, unduly burdensome, and seek information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the

Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

29. All Documents and Communications that refer, reflect, or relate to Your appearance on the “Late Late Show” hosted by James Corden on or about December 16, 2015.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrase “relate to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. For the same reasons, Defendant and Counterclaim Plaintiff objects to this Request as it is not bound by subject matter in any manner whatsoever. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced.

Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

30. All photographs taken on any of Your devices on December 15, 2015.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the undefined word “devices” in this Request as vague, ambiguous, and failing to define with particularity the information that it seeks. Defendant and Counterclaim Plaintiff objects to this Request, on the grounds that is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation, in that it seeks all photographs no matter the subject matter. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce any photographs in her possession, custody, and control of the incident on December 15, 2015, if any.

31. All Communications between You, Raquel Pennington, iO Tillett Wright and/or Melanie Inglessis on December 15, 2015; December 16, 2015; and December 17, 2015.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request having no limitations on subject matter and on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence

regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation.

Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is obtainable from other sources that are more convenient, less burdensome, and less expensive.

This Request is also overbroad and unduly burdensome to the point of harassment, is not calculated to lead to the discovery of information relevant to the subject matter of this action, and seeks information related to matters beyond the scope of the asserted claims and defenses in this suit because on December 18, 2020, the Fairfax County Circuit Court ruled that Request 43 of Mr. Depp's 3rd Requests for Documents seeking all communications between Ms. Heard and anyone relating to her relationship with Mr. Depp, claims of abuse or violence involving Mr. Depp, and injuries Ms. Heard contends she suffered as a result of Mr. Depp's conduct was overbroad, and therefore held that Request and this Request are beyond the scope of discovery in this case. The Fairfax County Circuit Court also ruled that Request 52 of Mr. Depp's 3rd Requests for Documents seeking all documents and communications relating to Ms. Heard's "relationship with Mr. Depp" was also overbroad, and therefore held that Request and this Request are beyond the scope of discovery in this case. These Orders should apply the same to these Requests for Production to Defendant and Counterclaim Plaintiff.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control responsive to this Request that refer to or

reflect the incident in Los Angeles on December 15, 2015, if any.

32. All Documents and Communications that refer, reflect, or relate to the incident at Your “Birthday party, April 2016” referenced in Your Witness Statement at paragraphs 148-154.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff’s Witness Statement referred to in this Request, if any.

33. All Communications from April 21, 2016 through and including the date on which You filed a request for a Domestic Violence Restraining Order on May 27, 2016, between You, on the one hand, and any of the “friends and family” that You describe in paragraph 153 of Your Witness Statement as being “increasingly worried” for Your safety and advising You that You “should leave,” including without limitation: iO Tillett Wright, Raquel Pennington, Whitney Henriquez, and Amanda de Cadenet.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. For the same reasons, Defendant and Counterclaim Plaintiff objects to this Request as it is not bound by subject matter in any manner whatsoever. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request to the extent it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect iO Tillett Wright, Raquel Pennington, Whitney Henriquez, and Amanda de Cadanet being increasingly worried about Defendant and Counterclaim Plaintiff's safety and advising that Defendant and Counterclaim Plaintiff should leave between April 21, 2016-May 27, 2016, if any.

34. All Communications that mention or relate in any way to Mr. Depp from April 21, 2016 through and including the date on which You filed a request for a Domestic Violence Restraining Order on May 27, 2016, between You, on the one hand, and any of

the “friends and family” that You describe in paragraph 153 of Your Witness Statement as being “increasingly worried” for Your safety and advising You that You “should leave,” including without limitation: iO Tillett Wright, Raquel Pennington, Whitney Henriquez, and Amanda de Cadenet.

OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request, including the phrases “relate in any way to,” on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 33. Defendant and Counterclaim Plaintiff further objects to this Request to the extent it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect iO Tillett Wright, Raquel Pennington, Whitney Henriquez, and Amanda de Cadenet being increasingly worried about Defendant and Counterclaim Plaintiff’s safety and advising that Defendant and Counterclaim Plaintiff should leave between April 21, 2016-May 27, 2016, if any.

35. All Documents and Communications that refer, reflect, or relate to the alleged incident in “Los Angeles, 21 May 2016” referenced in Your Witness Statement at paragraphs 155-175.

OBJECTION: Defendant and Counterclaim Plaintiff objects to the phrase “relate to” of this Request on the grounds that it is vague, ambiguous, and fails to define with particularity the information that it seeks, is overly broad, unduly burdensome, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties’ resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, Defendant and Counterclaim Plaintiff has produced or will produce non-privileged and non-work product documents in her possession, custody, and control that refer to or reflect the paragraphs of Defendant and Counterclaim Plaintiff’s Witness Statement referred to in this Request, if any.

36. All Documents and Communications that mention, refer, or relate in any way to Mr. Depp in May of 2016.

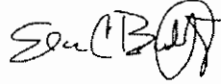
OBJECTION: Defendant and Counterclaim Plaintiff objects to this Request having no limitations on subject matter and on the grounds that it is vague, ambiguous, and fails to define

with particularity the information that it seeks, is overly broad, unduly burdensome, harassing, and seeks information not reasonably calculated to lead to the discovery of admissible evidence regarding the claims and defenses in this case, taking into account the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the discovery in resolving the issues at stake in this litigation. Defendant and Counterclaim Plaintiff further objects to this Request as it seeks documents that have already been produced. Defendant and Counterclaim Plaintiff further objects to this Request as duplicative of Request for Production 35. Defendant and Counterclaim Plaintiff further objects to this Request because it seeks information protected by the attorney-client privilege, and on the grounds that this Request invades protected litigation work product and would require disclosure of core opinion work product and mental impression of counsel, which is prohibited by 4:1(b)(3) of the Rules of the Virginia Supreme Court. Plaintiff and Counterclaim Defendant has not made the requisite showing under the Rules.

RESPONSE: Subject to and without waiving the objections, and notwithstanding that Defendant and Counterclaim Plaintiff has produced documents potentially responsive to this overbroad and unduly burdensome Request, Defendant and Counterclaim Plaintiff stands on her objections to this Request.

November 24, 2021

AS TO OBJECTIONS:



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CERTIFICATE OF SERVICE

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

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