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2. Copies of all state and federal tax returns prepared for any business entity owned or operated by JOHNNY DEPP.

- 3. Financial statements prepared for JOHNNY DEPP, including but not limited to, balance sheets, profit and loss statements, general ledgers, reconciliations of accounts, accounts receivable, accounts payable, books of account, disbursement ledgers, aging reports, depreciations schedules, lists of assets and debts, retained earnings, unearned income reports, loan documents, loan applications, record of sales, records of billings, corporate tax returns (with support schedules) and/or payroll records of JOHNNY DEPP, which you have prepared and/or created, in whole or in part, and/or received for the time period of January 1, 2013 to the date of production.
- Financial statements prepared for any business entity owned or operated by JOHNNY DEPP, including but not limited to, balance sheets, profit and loss statements, general ledgers, reconciliations of accounts, accounts receivable, accounts payable, 16 books of account, disbursement ledgers, aging reports, depreciations schedules, lists of assets and debts, retained earnings, unearned income reports, loan documents, loan applications, record of sales, records of billings, corporate tax returns (with support schedules) and/or payroll records, which you have prepared and/or created, in whole or in part, and/or received for the time period of January 1, 2013 to the date of production.
 - Writings, documents or correspondence to or from JOHNNY DEPP.
 - 6. Any and all other information, writings, correspondence or documents referring or relating to any professional services you provided to, or work you performed on behalf of, JOHNNY DEPP, including but not limited to any audits, assessments and levies, or any communications with the IRS, California Franchise Tax Board, any tax agents, other state or federal tax agencies, any appeals officers, any other tax authorities or agents,

Page 5

ATTACHMENT "3" TO DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS [THE MANDEL COMPANY, INC.]

K-1 forms, credit card statements, and receipts.

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7. Any and all documents provided to you by JOHNNY DEPP or on behalf of JOHNNY DEPP, including but not limited to financial statements, profit and loss statements, balance sheets, general ledgers, checks, bank statements, IRS 1099 forms,

petitions, appeals, protests of assessments or levies, reviews, forms submitted to tax

entities or agents, or other requests for review of or relief from any tax assessment or

8. Any and all documents provided to you by any business entity owned or operated by JOHNNY DEPP, including but not limited to financial statements, profit and loss statements, balance sheets, general ledgers, checks, bank statements, IRS 1099 forms, K-1 forms, credit card statements, and receipts.

- 9. Any and all writings, notes or memoranda pertaining to JOHNNY DEPP.
- 10. Any and all writings, documents, correspondence pertaining to JOHNNY DEPP from or to Edward White & Co., LLP.

End of Document.

Page 6

ATTACHMENT "3" TO DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS [THE MANDEL COMPANY, INC.]

SUBP-010

PLAINTIFF/PETITIONER: AMBER LAURA DEPP

CASE NUMBER:

DEFENDANT/RESPONDENT: JOHN CHRISTOPHER DEPP II (AKA JOHNNY DEPP)

BD 641 052

PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS

I served this Deposition Subpoena for Production of Business Records b	y personally delive	ring a copy to	the person s	erved as
follows:	er.	0		
a. Person served (name): - The Mandel Company, Inc.				
b. Address where served:			extre	
c. Date of delivery:				
d. Time of delivery:				
e. (1) Witness fees were paid. Amount:				
(2) Copying fees were paid. Amount:				
f. Fee for service:	Car Car			
I received this subpoena for service on (date):				OL.
Person serving: a. Not a registered California process server. b. California sheriff, marshall, or constable. c. Registered California process server.	SPA CKIRA		extrap	
 d Employee or independent contractor of a registered California e Exempt from registration under Bus. & Prof. Code section 223 f X. Registered professional photocopler, g Exempt from registration under Bus. & Prof. Code section 224 	350(b). 451,	eking		
h. Name, address, and telephone number and, if applicable, county or	f registration and n	umber;		
Nationwide Legal, LLC	etc.			et.
20 20				
Registration No.: X 408 Exp. Date: 3/30/2017 County: Los Angeles				
County, Los Angeles				
declare under penalty of perjury under the laws of the State of California	that the foregoing i	s true and co	wed.	
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Date:	iles Tilbs			
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SPECIOR LAW, APLC		
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TELEPHONE NO.: FAX NO.:	Man Man	
ORNEY FOR (Name) Plaintiff, Amber Laura Depp	of of	et et et
LAC INCELES COUNTY AUGUST CO.		
LOS ANGELES COUNTY SUPERIOR COURT		10 70 70
MAILING ADDRESS: 111 North Hill Street		The The The
CITY AND ZIP CODE LOS Angeles 90012		0 0 0
BRANCH NAME CENTRAL DISTRICT STANLEY MOSE	COUPTHOUSE	
PLAINTIFF/PETITIONER: AMBER LAURA DEPP	N COUNTHOUSE	CASE NUMBER:
, - militaria de la companya de la c		CASE NUMBER:
FENDANT/RESPONDENT: JOHN CHRISTOPHER DEPP II	(AKA JOHNNY DEPP)	BD 641 052
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NOTICE TO CONSUMER OR EMPLOYEE AND C	OR JECTION	a Ro Ro
(Code Civ. Proc.,§§ 1985.3, 1985.6)		72, 72, 72,
NOTICE TO CONSUM	AFR OR EMPLOYEE	
TO (name): JOHN CHRISTOPHER DEPP II (AKA J		
. PLEASE TAKE NOTICE THAT REQUESTING PARTY (name)	Amber Laure Dese	
SEEKS YOUR RECORDS FOR EVANIMATION IN the seeks	Amber Laura Depp	. tuly 22 2045
SEEKS YOUR RECORDS FOR EXAMINATION by the parties	to this action on (Specify Date).	: July 22, 2016
The records are described in the subpoena directed to witness	S (specify name and address of person	or entity from whom records are sought):
United Talent Agency, LLC c/o Andrew Thau		0- 0- 1
A copy of the subpoena is attached.	N. 162 162	
2. If you object to the production of these records, YOU MUST D	O ONE OF THE FOLLOWING	BEFORE THE DATE SPECIFIED
IN ITEM a. OR b. BELOW:	(a) (b)	
a. If you are a party to the above-entitled action, you must file	a motion pursuant to Code of	Civil Procedure section 1987.1 to
quash or modify the subpoens and give notice of that motion subpoens at least five days before the date set for the production.	n to the witness and the debo	
THE PROPERTY OF THE PROPERTY O	viction of the records	isition officer named in the
	uction of the records.	
b. If you are not a party to this action, you must serve on the	uction of the records. requesting party and on the wi	Itness, before the date set for
 b. If you are not a party to this action, you must serve on the a production of the records, a written objection that states the 	uction of the records. requesting party and on the wi e specific grounds on which pro	Itness, before the date set for iduction of such records should be
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	TIONER AMBER LAURA DEPP		CASE N	JMBER.	4/1
ENDANTAH	ESPONDENT. JOHN CHRISTOPHER DEF	P II (AKA JOHNN	Y DEPRI	er E	3D 641 052
	PROOF OF SERVICE OF NOT			ND OBJEC	TION
		de Civ. Proc.,§§ 1985.3, 1			31.
		ersonal Service	Mail		
. At the	time of service I was at least 18 years of age and	not a party to this legal a	ction.		
. I serve	d a copy of the Notice to Consumer or Employ	ee and Objection as foll	aws (check eithe	a or b);	
a	Personal service. I personally delivered the No	tice to Consumer or Em	ployee and Obje	ction as telle	ows:
	(1) Name of person served:	(3) D	ate served:		
	(2) Address:				
		(4) Ti	me served:		
b	Mail, I deposited the <i>Notice to Consumer or E</i> postage fully prepaid. The envelope was address	Employee and Objection sed as follows:	in the United Sta	as mait, in a	sealed envelope with
	(1) Name of person served;	(3) 🖸	ate of mailing:		
	(2) Address:		lace of mailing:		
	(5) I am a resident of or employed in the county	where the Notice to Con-	sumer or Emplo	ree and Obj	ection was mailed.
	residence or business address is (specify):	AL. A			
	phone number is (specify):		05.	. 65	0.5
	under penalty of perjury under the laws of the law:	s of the State of California	that the foregoing	is true and co	rrect.
)ate;			2		
		180			
07	(TYPE OR PRINT NAME OF PERSON WHO SERVED)	AT AT	(SIGNATUR	OF PERSON W	(HO SERVED)
		of Civ. Proc.,§§ 1985.3, 1			
		Personal Service	Mail		
	time of service I was at least 18 years of age and				
c. I serve	ed a copy of the <i>Objection to Production of Re</i> I THE REQUESTING PARTY	cords as follow (complet	e euner a or oj:		
2 01	THE REQUESTING PARTI				
	Personal sendre I personally delivered the	Objection to Production	of Records on t	Unive	
	Personal service. I personally delivered (he (i) Name of person served:			ollows:	
	(i) Name of person served;	(iii)	Date served:	ollows:	
	 (i) Name of person served; (ii) Address where served; Maif. I deposited the Objection to Product 	(iii) (iv) ion of Records in the Uni	Date served: Time served:		elope with postage
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(TYPE OR PRINT NAME OF PERSON WHO SERVED)

Date:

(SIGNATURE OF PERSON WHO SERVED)

SAMANTHA F. SPECTOR, SBN 204482 SPECTOR LAW, APLC	Marriage of Depp		OURT USE ONLY
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TELEPHONE NO.: FAX NO.(eptional)	760	180	
E-MAIL ADDRESS: SS@Speciorinwflrm.com	T 34	4	
ATTORNEY FOR (Name). Plaintiff, Amber Laura Depp		0	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS A	ANGELES	42 62	
CITY AND ZIP CODE: Los Angeles, 90012		70,	
BRANCH NAME: CENTRAL DISTRICT STANLEY M	OSK COURTHOUSE	S' (S'	
PLAINTIFF/ AMBER LAURA DEPP	·•·		
PETITIONER:		as as	
DEFENDANT/ JOHN CHRISTOPHER DEPP II (AKA RESPONDENT:	JOHNNY DEPP)	70.	
		25	
DEPOSITION SUBPOENA	10 10 10 10 10 10 10 10 10 10 10 10 10 1		C 41 0F2
For Production of Business Re		CASE NUMBER BE	041 USZ
FOI FIDUBCTION OF BUSINESS RE	coros	Mr. Mr.	- Yes - Yes
HE PEOPLE OF THE STATE OF CALIFORNIA, TO (marmo,	address, and telephone numb	er of deponent, if known):	Tel. No.
CUSTODIAN OF RECORDS OF: United Talen	t Agency, LLC c/a A	ndrew Thau.	
		0 0	. 6
. YOU ARE ORDERED TO PRODUCE THE BUSINESS R	ECORDS described in	Item 3, as follows:	162 167
To (name of deposition officer): Nationwide Le	gal, LLC		
On (date): 7/22/2016	At (time): 10:0	1 AM	0'
Location (address):			
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DEFINITIONS

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As used herein, the term "document" shall mean and include all written. typewritten, printed and graphic materials of whatever kind or nature, including, but not limited to, correspondence, notes, memoranda, electronically stored data, telegrams and cables, telexes, telecopies, panafaxes, publications, contracts, agreements, insurance policies, minutes, offers, analyses, studies, books, papers, records, reports, calendars, diaries, statements, complaints, filing with any court, tribunal or governmental agency, corporate minutes, ledgers, transcripts, summaries, agendas, work orders, repair orders, bills, invoices, receipts, estimates, evaluations, personnel files, diplomas, certificates, instructions, manuals, bulletins, advertisements, periodicals, accounting records, checks, check stubs, check registers, canceled checks, money orders, negotiable instruments, sound recordings, film photographs, mechanical or electronic recordings, tapes, transcriptions, blueprints, computer programs, data processing cards, credit memoranda, photographs or photostats of merchandise, appraisals, translations of any pertinent documents from foreign languages into English, records or returned merchandise, sales slips, microfiche records, waybills, ledger cards, credit bureau reports, purchase orders, and any and all computer files, including, but not limited to, hard disk files, floppy disk files, back-up copies, and deleted files that can be recovered by using special software, such as Norton Utilities or PC Tools, that are related to word processing, electronic spreadsheets, electronic mail (e-mail), personal-checkbook/home accounting, automated management of stock portfolios, point-of-sale, general ledger, accounts payable, and

ATTACHMENT "3" TO DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS

RECORDS ICUSTODIAN OF RECORDS, UNITED TALENT AGENCY, INC.]

Page

TTACHMENT "3" TO DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS [COR, UTA]

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accounts receivable, construction scheduling, material ordering, design manufacturing, and any other personal and/or business use.

- All documents or writings having information on both sides shall have both 2. sides produced.
- As used herein, the term "document" further means all writings, originals and duplicates as defined in California Evidence Code §§§ 250, 255 and 260, whether draft, or otherwise, including, but not limited to, copies and non-identical copies (whether different from the originals because of notes or marks made on or attached to said copies, or otherwise).

Evidence Code § 250 provides as follows: "Writing Defined, 'Writing' means handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, 16 sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored."

Evidence Code § 255 provides as follows: "Original Defined. means the writing itself or any counterpart intended to have the same effect by a person executing or issuing it. An 'original' of a photograph includes the negative or any print therefrom. If data are stores in a computer or similar device, any printout or other output readable by sight, shown to reflect the data accurately is an 'original.""

Evidence Code § 260 provides as follows: "Duplicate Defined. A 'duplicate' is a counterpart produced by the same impression as the original, or from the same matrix, or by means of photography, including enlargements and miniatures, or by

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mechanical or electronic re-recording, or by chemical reproduction, or by other equivalent technique which accurately reproduces the original."

- As used herein, the term "You" and "Your" shall mean and include UNITED TALENT AGENCY, INC. or any other derivative thereof and/or any agents or representatives of same.
- As used herein, the term "JOHN CHRISTOPHER DEPP II", "JOHN CHRISTOPHER DEPP II, AKA JOHNNY DEPP" or "JOHNNY DEPP" refers to the Respondent (Los Angeles Superior Court, Case No. BD 641 052) and vice versa.
- As used herein, the term "and" and "or" shall be construed both conjunctively and disjunctively, and each shall include the other whenever such a dual construction will serve to bring within the scope of a category documents or information which would not otherwise be within its scope.
- The singular number shall be read and applied as plural, where applicable, 16 and the plural number shall be read and applied as the singular, as the circumstances may deem necessary.
 - As used herein, the phrase "in Your possession" or "under Your control" includes, but is not limited to, documents which are available to You upon demand from third parties or which are reasonably available to You.
 - As used herein, "communication" shall refer to the giving or exchanging of information by talk, gestures, writings, or any other means, or to any request for information by such means.
 - "Person," as used herein, refers to any natural person, governmental entity, agency, commission, authority, or representative thereof, firm, corporation, partnership,

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association, joint venture or other form of legal entity, and shall be deemed to mean in the plural as well as in the singular.

- 11. "Correspondence," as used herein, refers to letters, telegrams, telexes, facsimiles, cables, emails, text messages, memoranda or other writings mailed, delivered or otherwise transmitted to any person, as person is defined herein.
- 12. The reference "to" any date specified herein shall be deemed to include such date.
- 13. With respect to the requests which follow, each shall include a request for documents concerning not only that property and those accounts, loans, assets, liabilities, etc., which now exist, but shall also include any that existed during the prescribed period any may no longer be in existence.

B. DOCUMENTS TO BE PRODUCED

Please produce the following documents relating to

JOHN CHRISTOPHER DEPP II, AKA JOHNNY DEPP,

(hereinafter "JOHNNY DEPP") for the period January 1,

2013 through and including the date of production:

- 1. All documents relating to, referencing or evidencing income or compensation of any kind made to JOHNNY DEPP or to any entity related to JOHNNY DEPP (i.e., loan-out corporation), including but not limited to wages, paystubs, tips, cash compensation, Employer's Report of Income (Wage and Tax Statement, Form W-2), Statements of Recipients (Form 1099), Form K-1s, cancelled checks (front and back), time cards, stock plans, stock funds, stock options, draws, salary, etc.
 - 2. All documents relating to, referencing or evidencing any time records for

Page 4

ATTACHMENT "3" TO DEPOSITION SUBPCENA FOR PRODUCTION OF BUSINESS RECORDS [COR, UTA]

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JOHNNY DEPP or for any entity related to JOHNNY DEPP (i.e., loan-out corporation), including but not limited to timesheets, balance sheets, calendars, schedules, appearances, etc.

- Any and all employment contracts for JOHNNY DEPP or for any entity related to JOHNNY DEPP (i.e., loan-out corporation).
- 4. All documents relating to, referencing or evidencing all monies withheld from JOHNNY DEPP or from any entity related to JOHNNY DEPP (i.e., loan-out corporation), including but not limited to tax withholding, professional fees, retirement contributions, or deferred income of any kind.
- 5. All documents relating to, referencing or evidencing any perquisites received by JOHNNY DEPP or by any entity related to JOHNNY DEPP (i.e., loan-out corporation), including but not limited to cash, meals, travel expenses, car allowance, or cellular phone allowance, whether reimbursed or not.
 - 6. All profit participation statements related to or regarding JOHNNY DEPP.
- All profit participation statements related to or regarding any entity related to JOHNNY DEPP (i.e., loan-out corporation).
 - 8. The entire personnel file for JOHNNY DEPP.

End of Document.

SUBP-010

PLAINTIFFIPETITIONER: AMBER LAURA DEPP

CASE NUMBER:

DEFENDANT/RESPONDENT: JOHN CHRISTOPHER DEPP II (AKA JOHNNY DEPP)

BD 641 052

PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS

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LAW OFFICES

WASSER, COOPERMAN & MANDLES

DENNIS M. WASSER
LAURA A, WASSER
BRUCE E. COOPERMAN
MELANIE D. MANDLES
LAURA LANDESMAN
JOHN A. FOLEY
AMY L. RICE
MAN ZIRAFI
SAMANTHA KLEIN
JAY A. POLSTEIN
PARIMA PANDKHOU
RAM F. COGAN

ERICA J. LUBANS

LISA P. SUTTON NINA F. DRUCKER PROFESSIONAL CORPORATION

TELEPHONE:

FACSIMILE:

MARY E. YATES PARALEGAL

June 30, 2016

VIA E-MAIL

Samantha F. Spector, Esq. SPECTOR LAW, APLC

Re: Marriage of Depp

Dear Samantha:

We received your recent discovery requests, including a Demand for Production and Inspection of Documents, Demand for Preliminary Declaration of Disclosure, Family Law Form Interrogatories, and notices to consumer for subpoenas you intend to serve upon Edward White & Co. and The Mandel Company. These requests seek detailed financial information regarding Johnny's assets.

In order to protect both Johnny's and Amber's privacy, we have asked your office to stipulate to a confidentiality agreement on several occasions. In letters dated May 27, 2016 and June 13, 2016, we proposed two different versions of a stipulated confidentiality agreement. Copies of these letters are enclosed for your reference. We are open to discussing revisions to either version. However, we cannot produce documents responsive to your discovery requests until a confidentiality agreement is executed.

Please let us know by Friday, July 8, 2016 whether Amber will enter into a confidentiality agreement. In the event that she will not, we will have no choice but to seek a protective order from the court. As confidentiality agreements are routine in dissolution cases, and in fact

Samantha F. Spector, Esq. Re: Marriage of Depp June 30, 2016 Page 2

essential here given the extraordinarily public nature of these proceedings thus far, we hope that no motion will be necessary.

Sincerely,

LISA P. SUTTON

LPS:dg/encl.

cc: John Depp (via email)
Patricia L. Glaser, Esq. (via email)
Kerry G. Wright, Esq. (via email)
Blair Berk, Esq. (via email)
Hans J. Allhoff, Esq. (via email)
Laura A. Wasser, Esq. (via email)
Samantha Klein, Esq. (via email)

LAW OFFICES

WASSER, COOPERMAN & MANDLES

DENNIS M. WASSER
LAURA A. WASSER
BRUCE C. COOPERMAN
MELANIS D. MANDLES
LAURA LANDESMAN
JOHN A. FOLEY
AMY L. RICE
NAN ZIRAFI
SAMANTHA KLEIN
JAY A. POLSTEIN
PARIMA PANDRHOU
RAM F. COOAN
ERICA J. LUBANS
LISA P. BUTTON

NINA F. DRUCKER

TELEPHONE
FACSIMILE:

PARALEGAL

May 27, 2016

VIA E-MAIL

Samantha F. Spector, Esq.

SPECTOR LAW, A PROFESSIONAL LAW CORPORATION

Re: Marriage of Depp

Dear Samantha;

We are in the process of gathering information relevant to the resolution of the financial issues in this case. In order to facilitate such resolution and protect Amber and Johnny's privacy, we ask that both parties execute the attached confidentiality stipulation. Please advise whether Amber is agreeable to executing this stipulation.

As I advised in my email and telephone calls on May 26, 2016, Johnny's accountants at Edward White and Company will make themselves available at your convenience to discuss his financial circumstances. I have not heard from you as to your availability. Please provide dates and times when you are available, or alternatively, advise if you no longer wish to participate in a call.

In addition, I have not heard back from you regarding the appointment of the judicial officer we discussed earlier this week. On May 26, 2016, I sent you a draft stipulation for the appointment of Judge Schnider as the protem in this matter. It was my understanding from our many telephone conversations that you had agreed to Judge Schnider. Please advise if this is no longer the case.

It was my further understanding that you were agreeable to participating in mediation. You suggested Judge Taylor as a pro tem, so I intuited that she might also be an acceptable settlement judge. In my email of May 26, 2016, I sent you Judge Taylor's available dates. I also sent you the availability for Judges Bobb and Johnson in the event that you were not available on Judge Taylor's dates. I have not heard back from you on this issue. Please advise as

Samantha F. Spector, Esq. Re: Marriage of Depp May 27, 2016 Page 2

to your availability so that we can schedule mediation without delay. If you do not wish to participate in mediation, please advise of that as well.

We look forward to hearing from you.

Very truly yours,

SAMANTHA KLEIN

SK/LPS:dg/enc.

cc: Johnny Depp w/att. (Via Email) Laura A. Wasser, Esq.