

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

3           3. Financial statements prepared for JOHNNY DEPP, including but not limited to,  
4 balance sheets, profit and loss statements, general ledgers, reconciliations of accounts,  
5 accounts receivable, accounts payable, books of account, disbursement ledgers, aging  
6 reports, depreciations schedules, lists of assets and debts, retained earnings, unearned  
7 income reports, loan documents, loan applications, record of sales, records of billings,  
8 corporate tax returns (with support schedules) and/or payroll records of JOHNNY DEPP,  
9 which you have prepared and/or created, in whole or in part, and/or received for the time  
10 period of January 1, 2013 to the date of production.  
11

12           4. Financial statements prepared for any business entity owned or operated by  
13 JOHNNY DEPP, including but not limited to, balance sheets, profit and loss statements,  
14 general ledgers, reconciliations of accounts, accounts receivable, accounts payable,  
15 books of account, disbursement ledgers, aging reports, depreciations schedules, lists of  
16 assets and debts, retained earnings, unearned income reports, loan documents, loan  
17 applications, record of sales, records of billings, corporate tax returns (with support  
18 schedules) and/or payroll records, which you have prepared and/or created, in whole or  
19 in part, and/or received for the time period of January 1, 2013 to the date of production.  
20  
21

22           5. Writings, documents or correspondence to or from JOHNNY DEPP.

23           6. Any and all other information, writings, correspondence or documents referring  
24 or relating to any professional services you provided to, or work you performed on behalf  
25 of, JOHNNY DEPP, including but not limited to any audits, assessments and levies, or  
26 any communications with the IRS, California Franchise Tax Board, any tax agents, other  
27 state or federal tax agencies, any appeals officers, any other tax authorities or agents,  
28



1 petitions, appeals, protests of assessments or levies, reviews, forms submitted to tax  
2 entities or agents, or other requests for review of or relief from any tax assessment or  
3 levies.

4 7. Any and all documents provided to you by JOHNNY DEPP or on behalf of  
5 JOHNNY DEPP, including but not limited to financial statements, profit and loss  
6 statements, balance sheets, general ledgers, checks, bank statements, IRS 1099 forms,  
7 K-1 forms, credit card statements, and receipts.

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

12 9. Any and all writings, notes or memoranda pertaining to JOHNNY DEPP.

13 10. Any and all writings, documents, correspondence pertaining to JOHNNY  
14 DEPP from or to Edward White & Co., LLP.

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18 *End of Document.*  
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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**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (name): **- The Mandel Company, Inc.**

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) ☐ Witness fees were paid.  
Amount: ..... \$ .00

(2) ☐ Copying fees were paid.  
Amount: ..... \$ .00

f. Fee for service: ..... \$ .00

2. I received this subpoena for service on (date):

3. Person serving:

- a. ☐ Not a registered California process server.  
 b. ☐ California sheriff, marshal, or constable.  
 c. ☐ Registered California process server.  
 d. ☐ Employee or independent contractor of a registered California process server.  
 e. ☐ Exempt from registration under Bus. & Prof. Code section 22350(b).  
 f. ☒ Registered professional photocopier.  
 g. ☐ Exempt from registration under Bus. & Prof. Code section 22451.  
 h. Name, address, and telephone number and, if applicable, county of registration and number:

Nationwide Legal, LLC

Registration No.: X 408

Exp. Date: 3/30/2017

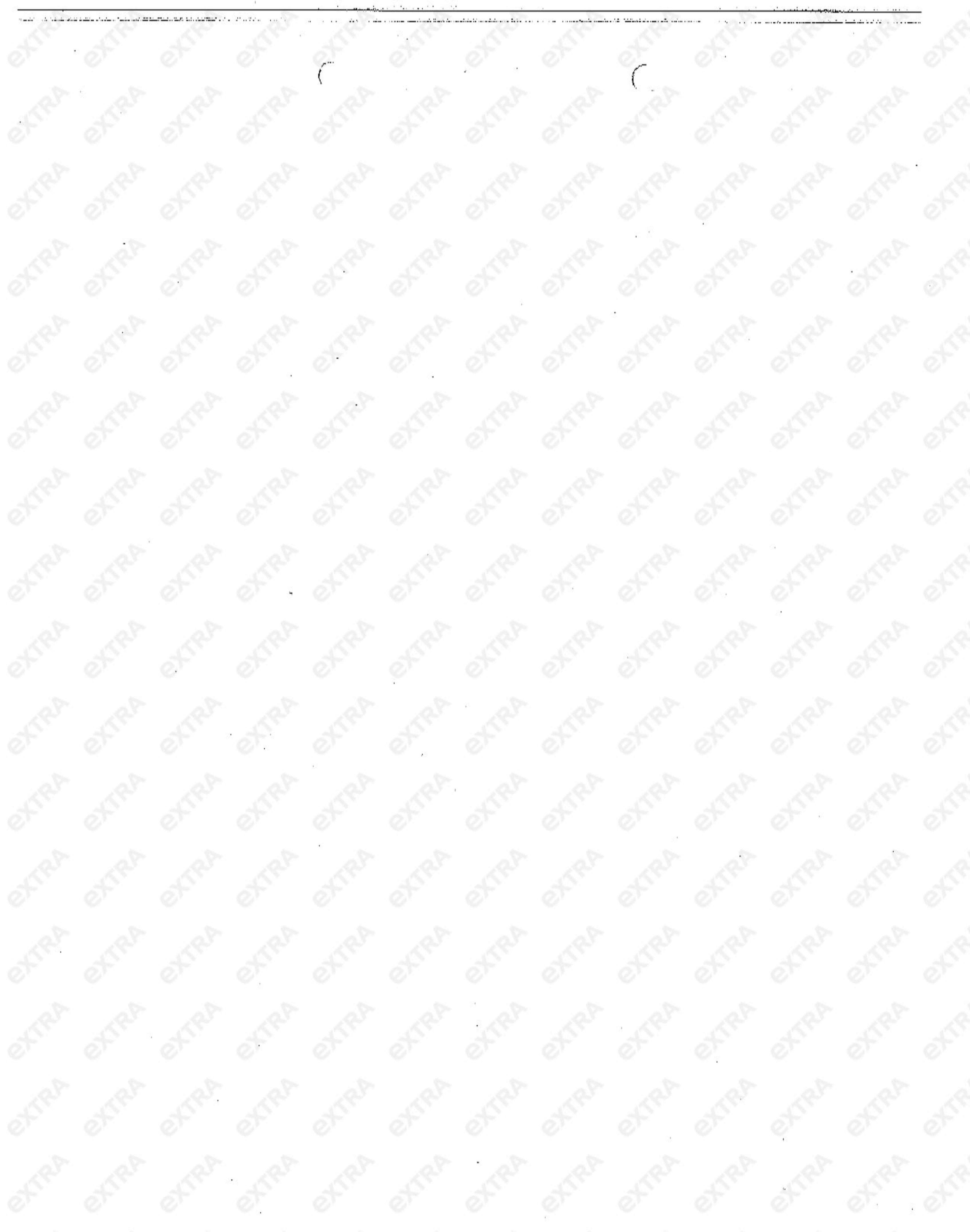
County: Los Angeles

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(SIGNATURE)





ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): <b>SAMANTHA F. SPECTOR, SEN 204482</b> <b>SPECTOR LAW, APLC</b> [REDACTED] TELEPHONE NO.: [REDACTED] FAX NO.: [REDACTED] ATTORNEY FOR (Name): Plaintiff, Amber Laura Depp		
<b>LOS ANGELES COUNTY SUPERIOR COURT</b> STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: CENTRAL DISTRICT STANLEY MOSK COURTHOUSE		
PLAINTIFF/PETITIONER: <b>AMBER LAURA DEPP</b> DEFENDANT/RESPONDENT: <b>JOHN CHRISTOPHER DEPP II (AKA JOHNNY DEPP)</b>		
NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION (Code Civ. Proc., §§ 1985.3, 1985.6)		CASE NUMBER: BD 641 052

## NOTICE TO CONSUMER OR EMPLOYEE

TO (name): **JOHN CHRISTOPHER DEPP II (AKA JOHNNY DEPP)**

- PLEASE TAKE NOTICE THAT REQUESTING PARTY (name): **Amber Laura Depp** 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 (specify name and address of person or entity from whom records are sought):  
**United Talent Agency, LLC c/o Andrew Thau [REDACTED]**  
 A copy of the subpoena is attached.
  - If you object to the production of these records, YOU MUST DO ONE OF THE FOLLOWING BEFORE THE DATE SPECIFIED IN ITEM a. OR b. BELOW:
    - 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 subpoena and give notice of that motion to the witness and the deposition officer named in the subpoena at least five days before the date set for the production of the records.
    - If you are not a party to this action, you must serve on the requesting party and on the witness, before the date set for production of the records, a written objection that states the specific grounds on which production of such records should be prohibited. You may use the form below to object and state the grounds for your objection. You must complete the Proof of Service on the reverse side indicating whether you personally served or mailed the objection. The objection should not be filed with the court. **WARNING: IF YOUR OBJECTION IS NOT RECEIVED BEFORE THE DATE SPECIFIED IN ITEM 1, YOUR RECORDS MAY BE PRODUCED AND MAY BE AVAILABLE TO ALL PARTIES.**
  - YOU OR YOUR ATTORNEY MAY CONTACT THE UNDERSIGNED to determine whether an agreement can be reached in writing to cancel or limit the scope of the subpoena. If no such agreement is reached, and if you are not otherwise represented by an attorney in this action, YOU SHOULD CONSULT AN ATTORNEY TO ADVISE YOU OF YOUR RIGHTS OF PRIVACY.
- Date: **July 01, 2016**

**SAMANTHA F. SPECTOR**

(TYPE OR PRINT NAME)

**/s/ SAMANTHA F. SPECTOR**(SIGNATURE OF ☐ REQUESTING PARTY ☒ ATTORNEY)**OBJECTION BY NON-PARTY TO PRODUCTION OF RECORDS**

- ☐ I object to the production of all of my records specified in the subpoena.
- ☐ I object only to the production of the following specified records:

- The specific grounds for my objection are as follows:

Date:

(TYPE OR PRINT NAME)

(SIGNATURE)

(See next page for proof of service)



PLAINTIFF/PETITIONER **AMBER LAURA DEPP**

CASE NUMBER

DEFENDANT/RESPONDENT **JOHN CHRISTOPHER DEPP II (AKA JOHNNY DEPP)****BD 641 052****PROOF OF SERVICE OF NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION**

(Code Civ. Proc., §§ 1985.3, 1985.6)

☐ Personal Service ☐ Mail

1. At the time of service I was at least 18 years of age and not a party to this legal action.

2. I served a copy of the *Notice to Consumer or Employee and Objection* as follows (check either a or b):a. ☐ Personal service. I personally delivered the *Notice to Consumer or Employee and Objection* as follows:

(1) Name of person served:

(3) Date served:

(2) Address:

(4) Time served:

b. ☐ Mail. I deposited the *Notice to Consumer or Employee and Objection* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:

(1) Name of person served:

(3) Date of mailing:

(2) Address:

(4) Place of mailing:

(5) I am a resident of or employed in the county where the *Notice to Consumer or Employee and Objection* was mailed.

c. My residence or business address is (specify):

d. My phone number is (specify):

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(TYPE OR PRINT NAME OF PERSON WHO SERVED)

(SIGNATURE OF PERSON WHO SERVED)

**PROOF OF SERVICE OF OBJECTION TO PRODUCTION OF RECORDS**

(Code of Civ. Proc., §§ 1985.3, 1985.6)

☐ Personal Service ☐ Mail

1. At the time of service I was at least 18 years of age and not a party to this legal action.

2. I served a copy of the *Objection to Production of Records* as follow (complete either a or b):

a. ON THE REQUESTING PARTY

(1) ☐ Personal service. I personally delivered the *Objection to Production of Records* as follows:

(i) Name of person served:

(iii) Date served:

(ii) Address where served:

(iv) Time served:

(2) ☐ Mail. I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:

(i) Name of person served:

(iii) Date of mailing:

(ii) Address:

(iv) Place of mailing (city and state):

(v) I am resident of or employed in the county where the *Objection to Production of Records* was mailed.

b. ON THE WITNESS:

(1) ☐ Personal service. I personally delivered the *Objection to Production of Records* as follows:

(i) Name of person served:

(iii) Date served:

(ii) Address where served:

(iv) Time served:

(2) ☐ Mail. I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:

(i) Name of person served:

(iii) Date of mailing:

(ii) Address:

(iv) Place of mailing (city and state):

(v) I am a resident of or employed in the county where the *Objection to Production of Records* was mailed.

3. My residence or business address is (specify):

4. My phone number is (specify):

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(TYPE OR PRINT NAME OF PERSON WHO SERVED)

(SIGNATURE OF PERSON WHO SERVED)



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address) <b>SAMANTHA F. SPECTOR, SBN 204482</b> <b>SPECTOR LAW, APLC</b>		Ref. No. or File No. <b>Marriage of Depp</b>	FOR COURT USE ONLY
TELEPHONE NO. [REDACTED] FAX NO. (optional) [REDACTED] E-MAIL ADDRESS: <b>ss@spectorlawfirm.com</b> ATTORNEY FOR (Name): <b>Plaintiff, Amber Laura Depp</b>			
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: <b>111 North Hill Street</b> CITY AND ZIP CODE: <b>Los Angeles, 90012</b> BRANCH NAME: <b>CENTRAL DISTRICT STANLEY MOSK COURTHOUSE</b>			
PLAINTIFF/ <b>AMBER LAURA DEPP</b> PETITIONER: DEFENDANT/ <b>JOHN CHRISTOPHER DEPP II (AKA JOHNNY DEPP)</b> RESPONDENT:			
DEPOSITION SUBPOENA For Production of Business Records			CASE NUMBER <b>BD 641 052</b>

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known): **Tel. No. [REDACTED]**  
CUSTODIAN OF RECORDS OF: **United Talent Agency, LLC c/o Andrew Thau, [REDACTED]**

**1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3, as follows:**

To (name of deposition officer): **Nationwide Legal, LLC**  
On (date): **7/22/2016** At (time): **10:00 AM**  
Location (address): **[REDACTED]**

**Do not release the requested records to the deposition officer prior to the date and time stated above.**

- a. ☒ by delivering a true, legible and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
- b. ☐ by delivering a true, legible and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code Section 1563(b).
- c. ☐ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code Section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code Section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):  
**SEE ATTACHMENT**

☒ Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

**DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.**

Date issued: **July 01, 2016**

**SAMANTHA F. SPECTOR**

(TYPE OR PRINT NAME)

**/s/ SAMANTHA F. SPECTOR**

(SIGNATURE OF PERSON ISSUING SUBPOENA)

**ATTORNEY AT LAW**

(TITLE)

(Proof of service on page two)

Page one of two



**ATTACHMENT "3" TO DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS****RECORDS [CUSTODIAN OF RECORDS, UNITED TALENT AGENCY, INC.]****A. DEFINITIONS**

1. 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



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

3       2. All documents or writings having information on both sides shall have both  
4 sides produced.

5       3. As used herein, the term "document" further means all writings, originals  
6 and duplicates as defined in California Evidence Code §§§ 250, 255 and 260, whether  
7 draft, or otherwise, including, but not limited to, copies and non-identical copies (whether  
8 different from the originals because of notes or marks made on or attached to said  
9 copies, or otherwise).

10  
11       Evidence Code § 250 provides as follows: "Writing Defined. 'Writing' means  
12 handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting  
13 by electronic mail or facsimile, and every other means of recording upon any tangible  
14 thing any form of communication or representation, including letters, words, pictures,  
15 sounds, or symbols, or combinations thereof, and any record thereby created, regardless  
16 of the manner in which the record has been stored."

17  
18       Evidence Code § 255 provides as follows: "Original Defined. 'Original'  
19 means the writing itself or any counterpart intended to have the same effect by a person  
20 executing or issuing it. An 'original' of a photograph includes the negative or any print  
21 therefrom. If data are stores in a computer or similar device, any printout or other output  
22 readable by sight, shown to reflect the data accurately is an 'original.'"

23  
24       Evidence Code § 260 provides as follows: "Duplicate Defined. A 'duplicate'  
25 is a counterpart produced by the same impression as the original, or from the same  
26 matrix, or by means of photography, including enlargements and miniatures, or by  
27



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

3 4. As used herein, the term "You" and "Your" shall mean and include UNITED  
4 TALENT AGENCY, INC. or any other derivative thereof and/or any agents or  
5 representatives of same.  
6

7 5. As used herein, the term "JOHN CHRISTOPHER DEPP II", "JOHN  
8 CHRISTOPHER DEPP II, AKA JOHNNY DEPP" or "JOHNNY DEPP" refers to the  
9 Respondent (Los Angeles Superior Court, Case No. BD 641 052) and vice versa.

10 6. As used herein, the term "and" and "or" shall be construed both  
11 conjunctively and disjunctively, and each shall include the other whenever such a dual  
12 construction will serve to bring within the scope of a category documents or information  
13 which would not otherwise be within its scope.  
14

15 7. 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  
17 may deem necessary.

18 8. As used herein, the phrase "in Your possession" or "under Your control"  
19 includes, but is not limited to, documents which are available to You upon demand from  
20 third parties or which are reasonably available to You.  
21

22 9. As used herein, "communication" shall refer to the giving or exchanging of  
23 information by talk, gestures, writings, or any other means, or to any request for  
24 information by such means.

25 10. "Person," as used herein, refers to any natural person, governmental entity,  
26 agency, commission, authority, or representative thereof, firm, corporation, partnership,  
27  
28



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

3 11. "Correspondence," as used herein, refers to letters, telegrams, telexes,  
4 facsimiles, cables, emails, text messages, memoranda or other writings mailed, delivered  
5 or otherwise transmitted to any person, as person is defined herein.

6 12. The reference "to" any date specified herein shall be deemed to include  
7 such date.

8 13. With respect to the requests which follow, each shall include a request for  
9 documents concerning not only that property and those accounts, loans, assets,  
10 liabilities, etc., which now exist, but shall also include any that existed during the  
11 prescribed period any may no longer be in existence.  
12  
13

14  
15 **B. DOCUMENTS TO BE PRODUCED**

16 Please produce the following documents relating to  
17 JOHN CHRISTOPHER DEPP II, AKA JOHNNY DEPP,  
18 (hereinafter "JOHNNY DEPP") for the period January 1,  
19 2013 through and including the date of production:  
20

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

27 2. All documents relating to, referencing or evidencing any time records for  
28



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

4  
5 3. Any and all employment contracts for JOHNNY DEPP or for any entity related  
6 to JOHNNY DEPP (i.e., loan-out corporation).

7  
8 4. All documents relating to, referencing or evidencing all monies withheld from  
9 JOHNNY DEPP or from any entity related to JOHNNY DEPP (i.e., loan-out corporation),  
10 including but not limited to tax withholding, professional fees, retirement contributions, or  
11 deferred income of any kind.

12  
13 5. All documents relating to, referencing or evidencing any perquisites received  
14 by JOHNNY DEPP or by any entity related to JOHNNY DEPP (i.e., loan-out corporation),  
15 including but not limited to cash, meals, travel expenses, car allowance, or cellular phone  
allowance, whether reimbursed or not.

16 6. All profit participation statements related to or regarding JOHNNY DEPP.

17  
18 7. All profit participation statements related to or regarding any entity related to  
19 JOHNNY DEPP (i.e., loan-out corporation).

20 8. The entire personnel file for JOHNNY DEPP.

21  
22 *End of Document.*



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

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (name): - United Talent Agency, LLC c/o Andrew Thau

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) ☐ Witness fees were paid.

Amount: ..... \$ .00

(2) ☐ Copying fees were paid.

Amount: ..... \$ .00

f. Fee for service: ..... \$ .00

2. I received this subpoena for service on (date):

3. Person serving:

- a. ☐ Not a registered California process server.  
 b. ☐ California sheriff, marshal, or constable.  
 c. ☐ Registered California process server.  
 d. ☐ Employee or independent contractor of a registered California process server.  
 e. ☐ Exempt from registration under Bus. & Prof. Code section 22350(b).  
 f. ☒ Registered professional photocopier.  
 g. ☐ Exempt from registration under Bus. & Prof. Code section 22451.  
 h. Name, address, and telephone number and, if applicable, county of registration and number:

Nationwide Legal, LLC

Registration No.: X 408

Exp. Date: 3/30/2017

County: Los Angeles

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(SIGNATURE)



LAW OFFICES  
**WASSER, COOPERMAN & MANDLES**  
PROFESSIONAL CORPORATION

DENNIS M. WASSER  
LAURA A. WASSER  
BRUCE E. COOPERMAN  
MELANIE D. MANDLES  
LAURA LANDESMAN  
JOHN A. FOLEY  
AMY L. RICE  
NAN ZIRAFI  
SAMANTHA KLEIN  
JAY A. POLSTEIN  
PARIMA PANDKHOU  
RAM F. COGAN  
ERICA J. LUBANS  
LISA P. SUTTON  
NINA F. DRUCKER

MARY E. YATES  
PARALEGAL

TELEPHONE: [REDACTED]  
FACSIMILE: [REDACTED]

June 30, 2016

**VIA E-MAIL**

Samantha F. Spector, Esq.  
SPECTOR LAW, APLC  
[REDACTED]

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,

A handwritten signature in black ink, appearing to read 'Lisa P. Sutton', with a stylized flourish at the end.

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**  
PROFESSIONAL CORPORATION

DENNIS M. WASSER  
LAURA A. WASSER  
BRUCE E. COOPERMAN  
MELANIE D. MANDLES  
LAURA LANDESMAN  
JOHN A. FOLEY  
AMY L. RICE  
NAN ZIRAPI  
SAMANTHA KLEIN  
JAY A. POLSTEIN  
PARIMA PANDKHOU  
RAM F. COGAN  
ERICA J. LUBANS  
LISA P. BUTTON  
NINA F. DRUCKER

MARY E. YATES  
PARALEGAL

TELEPHONE [REDACTED]  
FACSIMILE: [REDACTED]

May 27, 2016

**VIA E-MAIL**

Samantha F. Spector, Esq.  
SPECTOR LAW, A PROFESSIONAL LAW CORPORATION  
[REDACTED]

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 pro tem 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

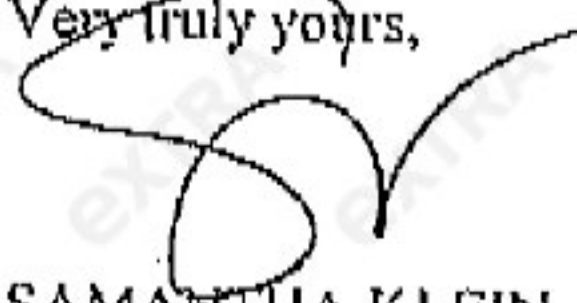


Samantha F. Spector, Esq.  
Re: Marriage of Depp  
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to your availability so that we can schedule mediation without delay. If you do not wish to participate in mediation, please advise of that as well.

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.