

1 bound by the terms of this Stipulation and Protective Order pending its entry so as to allow for
2 immediate production of Confidential Materials under the terms herein. This Stipulation and
3 Protective Order may be executed in counterparts.

4 **IT IS SO STIPULATED.**

5
6 DATED: June ____, 2016

AMBER LAURA DEPP, Petitioner

7
8 DATED: June ____, 2016

SPECTOR LAW, A PROFESSIONAL
LAW CORPORATION

9
10 By: _____

SAMANTHA F. SPECTOR
Attorneys for Petitioner

11
12
13 DATED: June ____, 2016

JOHN CHRISTOPHER DEPP II
(AKA JOHNNY DEPP), Respondent

14
15 DATED: June ____, 2016

WASSER, COOPERMAN & MANDLES
Professional Corporation

16
17
18 By: _____

LAURA A. WASSER
Attorneys for Respondent

19
20
21 **ORDER**

22 **GOOD CAUSE APPEARING, IT IS SO ORDERED.**

23
24 DATED: _____

JUDGE OF THE SUPERIOR COURT

EXHIBIT A

CERTIFICATION RE CONFIDENTIAL DISCOVERY MATERIALS

I hereby acknowledge that I, _____, am about to receive Confidential Materials supplied in connection with the Proceeding BD641052. I certify that I understand that the Confidential Materials are provided to me subject to the terms and restrictions of the Stipulation and Protective Order filed in this Proceeding. I have been given a copy of the Stipulation and Protective Order; I have read it, and I agree to be bound by its terms. I understand that Confidential Materials, as defined in the Stipulation and Protective Order, including any notes or other records that may be made regarding any such materials, shall not be Disclosed to anyone except as expressly permitted by the Stipulation and Protective Order. I will not copy or use, except solely for the purposes of this Proceeding, any Confidential Materials obtained pursuant to this Protective Order, except as provided therein or otherwise ordered by the Court in the Proceeding. I further understand that I am to retain all copies of all Confidential Material provided to me in the Proceeding in a secure manner, and that all copies of such Materials are to remain in my personal custody until termination of my participation in this Proceeding, whereupon the copies of such Materials will be returned to counsel who provided me with such Materials.

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

Executed this _____ day of _____, 2016, at _____, California.

DATED: _____

Signature

Title

Address

City, State, Zip

Telephone Number

1 PROOF OF SERVICE

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am employed in the County of Los Angeles, State of California. I am over the
4 age of 18 and not a party to the within action. My business address is [REDACTED]
[REDACTED]

5 On June 20, 2016, I served the foregoing document described as PETITIONER'S
6 FORM INTERROGATORIES - FAMILY LAW (SET NO. ONE) AND BLANK
7 SCHEDULE OF ASSETS AND DEBTS (FL-142) on the interested party(ies) in this
action by placing

8 the original x a true copy thereof addressed as follows:

9
10 LAURA A. WASSER, ESQ.
11 WASSER, COOPERMAN & MANDLES
12 [REDACTED]

13 X (BY PERSONAL SERVICE): I caused the above-named document(s) to be
14 personally delivered to the person being at the address(es) listed in the Service List
15 above. (1) For a party represented by an attorney, delivery was made to the attorney or
16 at the attorney's office by leaving the documents in an envelope or package clearly
17 labeled to identify the attorney being served with a receptionist or an individual in charge
18 of the office. (2) For a party, delivery was made to the party or by leaving the documents
at the party's residence with some person not less than 18 years of age between the
hours of eight in the morning and six in the evening.

19 I declare, under penalty of perjury, under the laws of the State of California, that
20 the above is true and correct. Executed June 20, 2016, at Los Angeles, California.

21 

22 Samantha F. Spector

1 SAMANTHA F. SPECTOR, ESQ. (SBN 204482)
2 SPECTOR LAW, APLC

3 [REDACTED]
4 Telephone [REDACTED]
5 Facsimile [REDACTED]

6 Attorneys for Petitioner
7 AMBER LAURA DEPP

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES

10
11 In re the Marriage of

12 AMBER LAURA DEPP,

13 Petitioner,

14 and

15 JOHN CHRISTOPHER DEPP II (AKA
16 JOHNNY DEPP)

17 Respondent.

CASE NO. BD 641 052

Judge: Hon. Carl Moor
Department: 6

DEMAND FOR PRELIMINARY
DECLARATION OF DISCLOSURE
PURSUANT TO FAMILY CODE
SECTION 2107

Date: July 20, 2016
Time: 10:00 a.m.

18
19
20
21 TO RESPONDENT, JOHN CHRISTOPHER DEPP II (AKA JOHNNY DEPP), AND
22 HIS ATTORNEY OF RECORD:

23 DEMAND IS HEREBY MADE pursuant to California Family Code Section 2107,
24 that Respondent, JOHN CHRISTOPHER DEPP II (AKA JOHNNY DEPP), produce a
25 completed Preliminary Declaration of Disclosure pursuant to Family Code 2104 on or
26 before July 20, 2016.

27
28 DEMAND FOR PRELIMINARY DECLARATION OF DISCLOSURE PURSUANT TO FAMILY CODE
SECTION 2107

1 If Respondent fails to comply with the duties and obligations set forth in Family
2 Code section 2104, Petitioner AMBER LAURA DEPP intends to seek relief from the
3 Court pursuant to Family Code section 2107, including a request for monetary sanctions.
4

5
6 Dated: June 20, 2016

SPECTOR LAW, APLC

7
8 By:


9 SAMANTHA F. SPECTOR
10 Attorneys for Petitioner,
11 AMBER LAURA DEPP
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1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I am employed in the County of Los Angeles, State of California. I am over the
4 age of 18 and not a party to the within action. My business address is [REDACTED]
[REDACTED]

5 On June 20, 2016, I served the foregoing document described as **DEMAND FOR**
6 **PRELIMINARY DECLARATION OF DISCLOSURE PURSUANT TO FAMILY CODE**
7 **SECTION 2107** on the interested party(ies) in this action by placing

8 ___ the original x a true copy thereof addressed as follows:

9 **LAURA A. WASSER, ESQ.**
10 **WASSER, COOPERMAN & MANDLES**
11 [REDACTED]
12 [REDACTED]

13 X (BY PERSONAL SERVICE): I caused the above-named document(s) to be
14 personally delivered to the person being at the address(es) listed in the Service List
15 above. (1) For a party represented by an attorney, delivery was made to the attorney or
16 at the attorney's office by leaving the documents in an envelope or package clearly
17 labeled to identify the attorney being served with a receptionist or an individual in charge
18 of the office. (2) For a party, delivery was made to the party or by leaving the documents
19 at the party's residence with some person not less than 18 years of age between the
20 hours of eight in the morning and six in the evening.

21 I declare, under penalty of perjury, under the laws of the State of California, that
22 the above is true and correct. Executed June 20, 2016, at Los Angeles, California.

23 

24 Samantha F. Spector
25
26
27
28

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address):

**SAMANTHA F. SPECTOR, SBN 204482
SPECTOR LAW, APLC**

TELEPHONE NO.:

FAX NO.:

ATTORNEY FOR (Name): Plaintiff, Amber Laura Depp

LOS ANGELES COUNTY SUPERIOR COURT

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: AMBER LAURA DEPP

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

CASE NUMBER:

BD 641 052

NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION
(Code Civ. Proc., §§ 1985.3, 1986.6)**NOTICE TO CONSUMER OR EMPLOYEE**

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

1. 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 20, 2016

The records are described in the subpoena directed to witness (specify name and address of person or entity from whom records are sought):

Edward White & Co., LLP

A copy of the subpoena is attached.

2. 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:

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 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.

b. 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.**

3. 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: June 27, 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**1. ☐ I object to the production of all of my records specified in the subpoena.2. ☐ I object only to the production of the following specified records:

3. 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:

BD 641 052DEFENDANT/RESPONDENT: **JOHN CHRISTOPHER DEPP II (AKA JOHNNY DEPP)****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): SAMANTHA F. SPECTOR, SBN 204482 SPECTOR LAW, APLC [REDACTED] TELEPHONE NO. [REDACTED] FAX NO. (optional) [REDACTED] E-MAIL ADDRESS: ss@spectorlawfirm.com ATTORNEY FOR (Name): Plaintiff, Amber Laura Depp		Ref. No. or File No. marriage of depp	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, 90012 BRANCH NAME: CENTRAL DISTRICT STANLEY MOSK COURTHOUSE			
PLAINTIFF/ AMBER LAURA DEPP PETITIONER: DEFENDANT/ JOHN CHRISTOPHER DEPP II (AKA JOHNNY DEPP) RESPONDENT:			
DEPOSITION SUBPOENA For Production of Business Records		CASE NUMBER: BD 641 052	

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known): **Tel. No. [REDACTED]**
CUSTODIAN OF RECORDS OF: **Edward White & Co., LLP** [REDACTED]
91367

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): 7/20/2016	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: **June 27, 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, EDWARD WHITE & CO., LLP]****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
4 EDWARD WHITE & CO., LLP, or any other derivative thereof and/or any agents or
5 representatives of EDWARD WHITE & CO., LLP.
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 9. As used herein, "communication" shall refer to the giving or exchanging of
22 information by talk, gestures, writings, or any other means, or to any request for
23 information by such means.
24

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

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
17 Please produce the following documents for all accounts
18 in the name of, or bearing the signatory authority of
19 JOHN CHRISTOPHER DEPP II (AKA JOHNNY DEPP) for
20 the period January 1, 2015 through and including the date
21 of production:
22

23 Your entire file pertaining to JOHN CHRISTOPHER DEPP II, AKA JOHNNY
24 DEPP, (hereafter referred to as "JOHNNY DEPP"), and/or any business entity
25 owned or operated by JOHNNY DEPP, including but not limited to the following:

26 1. Copies of all state and federal tax returns prepared for JOHNNY DEPP, both
27 personal and corporate.
28

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, 2015 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, 2015 to the date of production.
20

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

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 Joel Mandel, Robert Mandel, The Management Group or The Mandel
15 Company, Inc.
16
17

18
19 *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): **- Edward White & Co., LLP**

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)