

1 or have had any interest.

2 **PAYMENTS TO OR FOR YOU**

3 43. Cancelled checks, vouchers, payroll records, expense account ledgers and
4 other documents evidencing, reflecting upon or demonstrating payment to you, or for
5 your benefit, or on your behalf, as draw, salary, bonus, deferred compensation, expense
6 account reimbursement, direct payment of travel, meals, lodging, insurance, automobile,
7 and other expenses, advances, loans, and any other form of payments, by any
8 proprietorship, joint venture, partnership, realty trust, closely-held corporation or other
9 business entity in which you and/or your spouse have or have had an interest.
10

11 **PAYROLL TAX RETURNS**

12 44. Payroll tax returns for any proprietorship, joint venture, partnership, realty trust,
13 closely-held corporation or other business entity in which you and/or your spouse have or
14 have had an interest.
15

16 **BUSINESS PERSONAL PROPERTY**

17 45. Inventories, insurance policies, contracts, ownership documents, registration
18 certificates, appraisal reports and any other documents reflecting purchase, ownership,
19 cost value, obligations owed, selling price, and buyer or donee of any furniture,
20 furnishings, art works, automobile, boat, airplane or other tangible personal property
21 presently or previously acquired, owned by or standing in the name of any proprietorship,
22 joint venture, partnership, realty trust, closely-held corporation or other business entity in
23 which you and/or your spouse have or have had an interest.
24

25 **ASSETS AND OBLIGATIONS AS OF DATE OF MARRIAGE**

26 46. All documents, records and writings evidencing, reflecting upon or establishing
27 the identity, location, amount and value of all assets owned by you or in which you owned
28
DEMAND FOR PRODUCTION AND INSPECTION OF DOCUMENTS PURSUANT TO C.C.P. §2031.010,
ET SEQ [SET NO. ONE]

1 an interest as of the date of marriage to your spouse, as well as all of your then-
2 outstanding debts and liabilities, whether secured or unsecured.

3 **DISPOSITION OF SEPARATE PROPERTY, IF ANY, DURING MARRIAGE**

4
5 47. All documents, records, and writings, including, but not limited to, business and
6 personal banking and checking records, tracing schedules, cancelled checks, deposit
7 slips and other financial records evidencing, reflecting upon or establishing the existence,
8 sources and application of your claimed separate property funds, if any, during your
9 marriage to your spouse in connection with (a) the acquisition of real or personal
10 property, including down payments, payments for improvements, payments reducing the
11 principal of a loan used to finance a purchase or the improvement of real or personal
12 property, (b) the payment of interest on loans, or payments for maintenance, insurance or
13 taxation of real or personal property, (c) the payment of family living expenses, or (d)
14 disbursement for any other purpose whatsoever.
15

16 **REIMBURSEMENT CLAIMS, IF ANY**

17 48. All bills, statements of account, receipts, contracts, correspondence,
18 memoranda and any other documents, records and writings upon which you base the
19 contention that you are entitled to reimbursement of funds from your spouse or from the
20 community property of you and your spouse.
21

22 **AUTO INSURANCE INFORMATION**

23 49. All documents, records and writings evidencing, reflecting upon or establishing
24 auto insurance for and/or respecting any vehicles owned and/or driven by either party
25 hereto.
26
27

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]
5 [REDACTED]

6 On June 20, 2016, I served the foregoing document described as **DEMAND FOR**
7 **PRODUCTION AND INSPECTION OF DOCUMENTS PURSUANT TO C.C.P.**
8 **§2031.010, ET SEQ [SET NO. ONE]** on the interested party(ies) in this action by placing



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

10 **LAURA A. WASSER, ESQ.**
11 **WASSER, COOPERMAN & MANDLES PC**
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

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): SAMANTHA F. SPECTOR (SBN 204482) SPECTOR LAW, APC 		TELEPHONE NO.: 
ATTORNEY FOR (Name): AMBER LAURA DEPP		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES 111 NORTH HILL STREET LOS ANGELES, CA 90012		
SHORT TITLE: MARRIAGE OF DEPP		
FORM INTERROGATORIES-FAMILY LAW Asking Party: PETITIONER, AMBER LAURA DEPP Answering Party: RESPONDENT, JOHN CHRISTOPHER DEPP II Set No.: ONE		CASE NUMBER: BD 641 052

Sec. 1. Instructions to Both Parties

The interrogatories on page 2 of this form are intended to provide for the exchange of relevant information without unreasonable expense to the answering party. They do not change existing law relating to interrogatories, nor do they affect the answering party's right to assert any privilege or make any objection. **Privileges must be asserted.**

Sec. 2. Definitions

Words in **boldface** in these interrogatories are defined as follows:

- (a) **Person** includes a natural person; a partnership; any kind of business, legal, or public entity; and its agents or employees.
- (b) **Document** means all written, recorded, or graphic materials, however stored, produced, or reproduced.
- (c) **Asset or property** includes any interest in real estate or personal property. It includes any interest in a pension, profit-sharing, or retirement plan.
- (d) **Debt** means any obligation, including debts paid since the date of separation.
- (e) **Support** means any benefit or economic contribution to the living expenses of another person, including gifts.
- (f) If asked to **identify a person**, give the person's name, last known residence and business addresses, telephone numbers, and company affiliation at the date of the transaction referred to.
- (g) If asked to **identify a document**, attach a copy of the document unless you explain why not. If you do not attach the copy, describe the document, including its date and nature, and give the name, address, telephone number, and occupation of the person who has the document.

Sec. 3. Instructions to the Asking Party

Check the box next to each interrogatory you want the answering party to answer.

Sec. 4. Instructions to the Answering Party

You must answer these interrogatories under oath within 30 days, in accordance with Code of Civil Procedure section 2030.260.

You must furnish all information you have or can reasonably find out, including all information (not privileged) from your attorneys or under your control. If you don't know, say so.

If an interrogatory is answered by referring to a document, the document must be attached as an exhibit to the response and referred to in the response. If the document has more than one page, refer to the page and section where the answer can be found.

If a document to be attached to the response may also be attached to the *Schedule of Assets and Debts* (form FL-142), the document should be attached only to the response, and the form should refer to the response.

If an interrogatory cannot be answered completely, answer as much as you can, state the reason you cannot answer the rest, and state any information you have about the unanswered portion.

Sec. 5. Oath

Your answers to these interrogatories must be under oath, dated, and signed. Use the following statement at the end of your answers:

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

(DATE)

(SIGNATURE)

- ☒ 1. **Personal history.** State your full name, current residence address and work address, social security number, any other names you have used, and the dates between which you used each name.
- ☒ 2. **Agreements.** Are there any agreements between you and your spouse or domestic partner, made before or during your marriage or domestic partnership or after your separation, that affect the disposition of assets, debts, or support in this proceeding? If your answer is yes, for each agreement state the date made and whether it was written or oral, and attach a copy of the agreement or describe its contents.
- ☒ 3. **Legal actions.** Are you a party or do you anticipate being a party to any legal or administrative proceeding other than this action? If your answer is yes, state your role and the name, jurisdiction, case number, and a brief description of each proceeding.
- ☒ 4. **Persons sharing residence.** State the name, age, and relationship to you of each person at your present address.
- ☒ 5. **Support provided others.** State the name, age, address, and relationship to you of each person for whom you have provided support during the past 12 months and the amount provided per month for each.
- ☒ 6. **Support received for others.** State the name, age, address, and relationship to you of each person for whom you have received support during the past 12 months and the amount received per month for each.
- ☒ 7. **Current income.** List all income you received during the past 12 months, its source, the basis for its computation, and the total amount received from each. Attach your last three paycheck stubs.
- ☒ 8. **Other income.** During the past three years, have you received cash or other property from any source not identified in item 7? If so, list the source, the date, and the nature and value of the property.
- ☒ 9. **Tax returns.** Attach copies of all tax returns and tax schedules filed by or for you in any jurisdiction for the past three calendar years.
- ☒ 10. **Schedule of assets and debts.** Complete the *Schedule of Assets and Debts* (form FL-142) served with these interrogatories.
- ☒ 11. **Separate property contentions.** State the facts that support your contention that an asset or debt is separate property.
- ☒ 12. **Property valuations.** During the past 12 months, have you received written offers to purchase or had written appraisals of any of the assets listed on your completed *Schedule of Assets and Debts*? If your answer is yes, identify the document.
- ☒ 13. **Property held by others.** Is there any property held by any third party in which you have any interest or over which you have any control? If your answer is yes, indicate whether the property is shown on the *Schedule of Assets and Debts* completed by you. If it is not, describe and identify each such asset, state its present value and the basis for your valuation, and identify the person holding the asset.
- ☒ 14. **Retirement and other benefits.** Do you have an interest in any disability, retirement, profit-sharing, or deferred compensation plan? If your answer is yes, identify each plan and provide the name, address, and telephone number of the administrator and custodian of records.
- ☒ 15. **Claims of reimbursement.** Do you claim the legal right to be reimbursed for any expenditures of your separate or community property? If your answer is yes, state all supporting facts.
- ☒ 16. **Credits.** Have you claimed reimbursement credits for payments of community debts since the date of separation? If your answer is yes, identify the source of payment, the creditor, the date paid, and the amount paid. State whether you have added to the debt since the separation.
- ☒ 17. **Insurance.** Identify each health, life, automobile, and disability insurance policy or plan that you now own or that covers you, your children, or your assets. State the policy type, policy number, and name of the company. Identify the agent and give the address.
- ☒ 18. **Health.** Is there any physical or emotional condition that limits your ability to work? If your answer is yes, state each fact on which you base your answer.
- ☐ 19. **Children's needs.** Do you contend that any of your children have any special needs? If so, identify the child with the need, the reason for the need, its cost, and its expected duration.
- ☒ 20. **Attorney fees.** State the total amount of attorney fees and costs incurred by you in this proceeding, the amount paid, and the source of the money paid. Describe the billing arrangements.
- ☒ 21. **Gifts.** List any gifts you have made without the consent of your spouse or domestic partner in the past 24 months, their values, and the recipients.

THIS FORM SHOULD NOT BE FILED WITH THE COURT

FL-142

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address):		TELEPHONE NO.:
ATTORNEY FOR (Name):		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF		
PETITIONER:		
RESPONDENT:		
SCHEDULE OF ASSETS AND DEBTS <input type="checkbox"/> Petitioner's <input type="checkbox"/> Respondent's		CASE NUMBER:

- INSTRUCTIONS -

List all your known community and separate assets or debts. Include assets even if they are in the possession of another person, including your spouse. If you contend an asset or debt is separate, put P (for Petitioner) or R (for Respondent) in the first column (separate property) to indicate to whom you contend it belongs.

All values should be as of the date of signing the declaration unless you specify a different valuation date with the description. For additional space, use a continuation sheet numbered to show which item is being continued.

ITEM NO.	ASSETS DESCRIPTION	SEP. PROP.	DATE ACQUIRED	CURRENT GROSS FAIR MARKET VALUE	AMOUNT OF MONEY OWED OR ENCUMBRANCE
1.	REAL ESTATE (Give street addresses and attach copies of deeds with legal descriptions and latest lender's statement.)			\$	\$
2.	HOUSEHOLD FURNITURE, FURNISHINGS, APPLIANCES (Identify.)				
3.	JEWELRY, ANTIQUES, ART, COIN COLLECTIONS, etc. (Identify.)				

Page 1 of 4

ITEM NO.	ASSETS DESCRIPTION	SEP. PROP.	DATE ACQUIRED	CURRENT GROSS FAIR MARKET VALUE	AMOUNT OF MONEY OWED OR ENCUMBRANCE
4.	VEHICLES, BOATS, TRAILERS <i>(Describe and attach copy of title document.)</i>			\$	\$
5.	SAVINGS ACCOUNTS <i>(Account name, account number, bank, and branch. Attach copy of latest statement.)</i>				
6.	CHECKING ACCOUNTS <i>(Account name and number, bank, and branch. Attach copy of latest statement.)</i>				
7.	CREDIT UNION, OTHER DEPOSIT ACCOUNTS <i>(Account name and number, bank, and branch. Attach copy of latest statement.)</i>				
8.	CASH <i>(Give location.)</i>				
9.	TAX REFUND				
10.	LIFE INSURANCE WITH CASH SURRENDER OR LOAN VALUE <i>(Attach copy of declaration page for each policy.)</i>				

ITEM NO.	ASSETS DESCRIPTION	SEP. PROP.	DATE ACQUIRED	CURRENT GROSS FAIR MARKET VALUE	AMOUNT OF MONEY OWED OR ENCUMBRANCE
11.	STOCKS, BONDS, SECURED NOTES, MUTUAL FUNDS (Give certificate number and attach copy of the certificate or copy of latest statement.)			\$	\$
12.	RETIREMENT AND PENSIONS (Attach copy of latest summary plan documents and latest benefit statement.)				
13.	PROFIT-SHARING, ANNUITIES, IRAS, DEFERRED COMPENSATION (Attach copy of latest statement.)				
14.	ACCOUNTS RECEIVABLE AND UNSECURED NOTES (Attach copy of each.)				
15.	PARTNERSHIPS AND OTHER BUSINESS INTERESTS (Attach copy of most current K-1 form and Schedule C.)				
16.	OTHER ASSETS				
17.	TOTAL ASSETS FROM CONTINUATION SHEET				
18.	TOTAL ASSETS			\$	\$

ITEM NO.	DEBTS-SHOW TO WHOM OWED	SEP. PROP.	TOTAL OWING	DATE INCURRED
19.	STUDENT LOANS <i>(Give details.)</i>		\$	
20.	TAXES <i>(Give details.)</i>			
21.	SUPPORT ARREARAGES <i>(Attach copies of orders and statements.)</i>			
22.	LOANS - UNSECURED <i>(Give bank name and loan number and attach copy of latest statement.)</i>			
23.	CREDIT CARDS <i>(Give creditor's name and address and the account number. Attach copy of latest statement.)</i>			
24.	OTHER DEBTS <i>(Specify.)</i>			
25.	TOTAL DEBTS FROM CONTINUATION SHEET			
26.	TOTAL DEBTS		\$	

27. ☐ *(Specify number)* : _____ pages are attached as continuation sheets.

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)

(SIGNATURE OF DECLARANT)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): SAMANTHA F. SPECTOR, SBN 204482 SPECTOR LAW, APC [REDACTED] TELEPHONE NO.: [REDACTED] FAX NO.: [REDACTED] 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, 1985.6)		

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 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):
The Mandel Company, Inc. [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: **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**

- ☐ 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): SAMANTHA F. SPECTOR, SBN 204482 SPECTOR LAW, APLC		Ref. No. or File No. marriage of depp	FOR COURT USE ONLY
TELEPHONE NO. [REDACTED] FAX NO. (optional): [REDACTED] E-MAIL ADDRESS: [REDACTED] ATTORNEY FOR (Name): Plaintiff, Amber Laura Depp			
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):

CUSTODIAN OF RECORDS OF: **The Mandel Company, Inc., [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): 7/20/2016	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

(Proof of service on page two)

(TITLE)

Page one of two

ATTACHMENT "3" TO DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS**RECORDS [CUSTODIAN OF RECORDS, THE MANDEL COMPANY, 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 THE
4 MANDEL COMPANY, INC., THE MANDEL COMPANY, INC. dba THE MANAGEMENT
5 GROUP, or any other derivative thereof and/or any agents or representatives of same,
6 including but not limited to Robert Mandel or Joel Mandel.
7

8 5. As used herein, the term "JOHN CHRISTOPHER DEPP II", "JOHN
9 CHRISTOPHER DEPP II, AKA JOHNNY DEPP" or "JOHNNY DEPP" refers to the
10 Respondent (Los Angeles Superior Court, Case No. BD 641 052) and vice versa.
11

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

16 7. The singular number shall be read and applied as plural, where applicable,
17 and the plural number shall be read and applied as the singular, as the circumstances
18 may deem necessary.

19 8. As used herein, the phrase "in Your possession" or "under Your control"
20 includes, but is not limited to, documents which are available to You upon demand from
21 third parties or which are reasonably available to You.
22

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

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

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

9 13. With respect to the requests which follow, each shall include a request for
10 documents concerning not only that property and those accounts, loans, assets,
11 liabilities, etc., which now exist, but shall also include any that existed during the
12 prescribed period any may no longer be in existence.
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, 2013 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