

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

3 Telephone: [REDACTED]
4 Facsimile: [REDACTED]

5 Attorneys for Petitioner
6 AMBER LAURA DEPP

7
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
18
19

CASE NO. BD 641 052

Judge: Hon. Carl Moor
Department: 6

DEMAND FOR PRODUCTION AND
INSPECTION OF DOCUMENTS
PURSUANT TO C.C.P. §2031.010, ET
SEQ [SET NO. ONE]

Date: July 20, 2016
Time: 10:00 a.m.
Place: Spector Law, APLC
[REDACTED]

21 PROPOUNDING PARTY: Petitioner, AMBER LAURA DEPP

22 RESPONDING PARTY: Respondent, JOHN CHRISTOPHER DEPP II (AKA
23 JOHNNY DEPP)
24

25 SET NUMBER: ONE

26 TO RESPONDENT, JOHN CHRISTOPHER DEPP II, AKA JOHNNY DEPP, AND
27 TO HIS ATTORNEYS OF RECORD, WASSER, COOPERMAN & MANDLES, PC, AND

28 DEMAND FOR PRODUCTION AND INSPECTION OF DOCUMENTS PURSUANT TO C.C.P. §2031.010,
ET SEQ [SET NO. ONE]

1 LAURA A. WASSER, ESQ.:

2 DEMAND IS HEREBY MADE pursuant to California Code of Civil Procedure,
3 Section 2031.010, et seq., that RESPONDENT, JOHN CHRISTOPHER DEPP II, AKA
4 JOHNNY DEPP, appear on July 20, 2016, at 10:00 a.m. at the law offices of Spector
5 Law, APLC, located at [REDACTED]
6 [REDACTED]

7 and produce the documents described in Exhibit "A," attached hereto and
8 incorporated herein by reference, for the purpose of inspection, copying and
9 photographing.

10 Respondent shall serve a written response, subscribed by him under oath, within
11 30 days after service of this Demand, and shall provide therein all information mandated
12 by CCP §2031.210 – 2031.250.

13 A personal appearance by Respondent or counsel is not required if Respondent
14 submits copies of the requested documents prior to July 20, 2016, with a Verification
15 executed, under penalty of perjury, by Respondent that the documents provided are
16 accurate and true copies of the complete records requested.
17
18

19 Dated: June 20, 2016

SPECTOR LAW, APLC

20
21
22 By: 

23 SAMANTHA F. SPECTOR
24 Attorneys for Petitioner,
25 AMBER LAURA DEPP
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29 DEMAND FOR PRODUCTION AND INSPECTION OF DOCUMENTS PURSUANT TO C.C.P. §2031.010,
30 ET SEQ [SET NO. ONE]

1 **EXHIBIT "A"**

2
3 **DEFINITIONS**

- 4
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6 A. "Document," as used herein, refers to notes, memoranda, letters, emails,
7 telegrams, cables, reports, studies, analyses, charts, tables, tabulations,
8 compilations, summaries, contracts, indices, abstracts, recordings, tape
9 recordings, drawings, blueprints, labels, tags, pleadings, testimony,
10 speeches, articles, books, pamphlets, brochures, magazines, newspapers,
11 calendars, diaries, minute orders, photographs, moving pictures, microfilm,
12 computer printouts, advertisements and memorials of oral communications
13 (whether by telephone or face to face), including originals, as well as non-
14 conforming copies, no matter how prepared, in your actual or constructive
15 possession, custody or control, or in the actual or constructive possession,
16 custody or control of your agents or attorneys.
17
18 B. "Person," as used herein, refers to any natural person, governmental entity,
19 agency, commission, authority, or representative thereof, firm, corporation,
20 partnership, association, joint venture or other form of legal entity, and shall
21 be deemed to mean in the plural as well as in the singular.
22
23 C. "Correspondence," as used herein, refers to letters, emails, telegrams,
24 cables, memoranda or other writings mailed, delivered or otherwise
25 transmitted to any person, as person is defined herein.
26
27 D. As used herein, the term "closely-held corporation" refers to any corporation
28 in which you individually, or jointly with your spouse or any other person,

1 have or have had an interest in excess of 10 percent or in which there were
2 less than 10 shareholders.

3 E. "Counsel," as used herein, refers to any lawyer, attorney or such other
4 person designated as "counsel."

5 F. "Income," as used herein, refers to any gross receipts, monies received,
6 sales, commissions, rents, royalties, dividends, interest, or any other
7 monies or properties, real or personal, earned or received.

8 G. "Parties," as used herein, refers to either Petitioner, or Respondent, or both.

9 H. "Identify," "Identifying," or "Identities," as used herein, in connection with a
10 reference to a person, shall include the person's full name, occupation,
11 home and business addresses, and home and business telephone
12 numbers.

13 I. The reference "to" any date specified herein shall be deemed to include
14 such date.

15 J. "Interest," as used herein, shall include, but not necessarily be limited to,
16 ownership of any stock in a corporation, rights to or ownership in any
17 general partnership, rights to or ownership in any limited partnership,
18 participation in profits of any business entity or any other proprietary rights.

19 K. "Improvement," as used herein, shall include, but not be limited to, a
20 valuable addition made to property or a betterment in its condition,
21 amounting to more than mere repairs or replacement, costing labor or
22 capital, and intended to enhance value, beauty or utility or to adapt for new
23 or further purposes.

24 L. The singular number shall be read and applied as a plural, and the plural

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number shall be read and applied as a singular, as the circumstances may make appropriate.

M. With respect to each document otherwise responsive to this request, but withheld on the ground of an asserted privilege, please identify with respect to each such document the following information:

- a. The exact nature and scope of the privilege asserted;
- b. The date of the document;
- c. The identity of the author of the document;
- d. The identity of the person who received the original of the document;
- e. The identity of each person who received a copy of the document; and
- f. The subject of the document.

N. 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 and may no longer be in existence.

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1 DOCUMENTS TO BE PRODUCED

2
3 UNLESS OTHERWISE INDICATED, THE FOLLOWING
4 DOCUMENTS ARE TO BE PRODUCED FOR THE PERIOD
5 FROM JANUARY 1, 2015 THROUGH AND INCLUDING THE
6 DATE OF PRODUCTION.
7

8
9 TAX RETURNS

10 1. Copies of federal and state income tax returns filed by you individually and/or
11 jointly, together with accompanying work sheets, any amendments, adjustments,
12 extension requests and all correspondence related thereto.
13

14 INCOME SINCE LAST TAX RETURN

15 2. Copies of Employer's Report of Income (Wage and Tax Statement, Form W-2),
16 Statements of Recipients (Form 1099), Form K-1s, and any and all other documents
17 reflecting income and/or other monies received by you in any manner whatsoever, from
18 any and all sources, individually or jointly with your spouse or any other person, during
19 any calendar year period for which you have not as yet filed Income tax returns through
20 the date of production. By way of example, if you filed income tax returns for 2013, the
21 period covered by this category would be January 1, 2014, through the date of
22 production. By way of further example, if the last year for which you filed income tax
23 returns was 2012, the period covered by this category would be January 1, 2013, through
24 the date of production.
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LOANS

6. Copies of all loan applications and statements of loan accounts for all loans applied for by you, whether or not taken or approved.

BOOKS OF ACCOUNT

7. Books of account, cash receipts and disbursement ledgers, and all other documents reflecting income, expenses and/or assets and liabilities of you, individually or jointly with your spouse, including your children or any other person.

REAL PROPERTY

8. Contracts, sales agreements, escrow instructions, deeds, policies of title insurance, tax bills, promissory notes, trust deeds, escrow statements, appraisal reports, insurance policies, rental income and expense records, leases and any other documents reflecting ownership, cost of acquisition, sources and application of funds utilized to pay cost of acquisition, value, obligations owed, selling price, income and expenses (including monthly payments and present outstanding balance of principal and interest) buyer or done of any real property (including leaseholds) presently or previously acquired, owned by or standing in your name individually or jointly with your spouse or any other person, or leased by you individually or jointly with your spouse or any other person.

IMPROVEMENTS TO REAL PROPERTY

9. All bills, receipts, copies of checks paid for all work and/or improvements done on any real property in which you have an interest, including, but not limited to, monies paid to architects, people who have worked on the subject real property and/or companies hired to perform work on the subject real property.

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1 **MEDICAL EXPENSE REIMBURSEMENT**

2 14. All statements, check stubs, records and other documents showing the amount
3 of money reimbursed to you for your medical expenses, or those of any other person.
4

5 **SAFE DEPOSIT BOXES**

6 15. Rental agreements and all other records reflecting or relating to the rental of,
7 rights of access to, and the contents of any safe deposit box in which you have or have
8 had any access or interest.

9 **CREDIT, CHARGE ACCOUNT RECORDS**

10 16. Monthly statements and charge vouchers reflecting your use of charge
11 accounts with American Express Company, Visa, Mastercard, departments stores, oil
12 and gasoline companies and any other credit card organizations, alone or jointly with
13 your spouse or any other person, or in the name of any other person, including, but not
14 limited to, your spouse.
15

16 **STOCK BROKERAGE ACCOUNTS**

17 17. Monthly statements, purchase and/or sale confirmations, account agreements,
18 summary sheets and other records relating to securities purchased and/or sold, or
19 pertaining to any stock, commodity or other brokerage account owned by or standing in
20 your name, individually or jointly with your spouse or any other person(s) or entity.
21

22 **EMPLOYMENT CONTRACTS**

23 18. All documents evidencing, relating to or reflecting your employment and
24 income (whether taxable or nontaxable), including, but not limited to, employment
25 contracts, memoranda, correspondence, wages, salaries, bonuses, draws, dividends,
26 officer loans, stock options, commissions, earnings, income, employment, profit
27 participation agreements or contracts, pay raises, promotions, payroll deductions, other
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1 deductions of any kinds, credit union accounts, pension plan, pension fund, retirement
2 plan, retirement fund, stock plan and stock fund and other benefits or deductions of any
3 kind which are, were previously, or which may be in the future paid, available, accepted,
4 rejected, credited, offered, withheld for any purpose by any individual, agency,
5 department, company or otherwise, or to which you are, were or may become entitled in
6 the future.
7

8 PENSION PLANS

9 19. Plan summaries, annual beneficiary statements, copy of plan, periodic reports,
10 loan documentation, promissory notes, correspondence and all other documents
11 evidencing, reflecting upon or relating to any retirement, pension, profit sharing, stock
12 option, deferred compensation or any other employee benefit plan in which you have or
13 have had an interest.
14

15 20. Any and all records and documents reflecting any and all accruals and/or
16 contributions to or withdrawals from any and all pension plans, retirement plans, profit
17 sharing plans, trusts or funds, individual retirement accounts or other plans, trust or funds
18 utilized by you or any person acting on your behalf for any purpose, including to defer
19 income and/or minimize present tax payments.
20

21 FRINGE BENEFITS

22 21. Vouchers, expense accounts, memoranda, books, statements and other
23 documents reflecting obligations incurred by you, or for your benefit, and paid for by any
24 other person, firm or entity for automobile, travel, meals, lodging, life, health and accident
25 insurance, bonuses, entertainment, telephone and any other expenses.
26

27 NOTES PAYABLE/RECEIVABLE

28 22. Promissory notes, and any documents executed in connection with security
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1 therefor, and any correspondence or other records relating to or reflecting monies owned
2 by you, or monies owed to you, individually, or jointly with your spouse or any other
3 person(s) or entity.

4 **COPIES OF STOCKS, BONDS, ETC.**

5
6 23. Copies of all certificates of stock, bonds, certificates of deposit and other
7 securities presently in your name, individually, or jointly with your spouse or any other
8 person.

9 **SOCIAL MEMBERSHIPS, CLUBS**

10 24. Contracts, monthly statements and bylaws relating to your membership in any
11 country club, beach club or other social organization.

12 **DEBTS AND LIABILITIES**

13
14 25. Invoices, correspondence and other records relating to or evidencing any
15 current outstanding indebtedness, obligation or liability, including contingent liabilities, of
16 you, individually, or jointly with your spouse or any other person, including any lawsuits
17 now pending or previously pending in any court whatsoever and all cases resolved
18 without litigation or presently in the process of negotiation.

19 **LIVING EXPENSES**

20 26. Bills, invoices, receipts, schedules, budgets, financial summaries and any
21 other records and documents reflecting or evidencing monthly expenses incurred by you
22 and/or expenditures paid by you, whether individually or on behalf of any other person,
23 including dependents, for the following expenses:

- 24
25 a. Housing costs, rent or mortgage;
26 b. Taxes and insurance on residence;
27 c. Maintenance on residence;

- 1 d. Food and household supplies;
2 e. Utilities;
3 f. Telephone;
4 g. Laundry and cleaning;
5 h. Clothing;
6 i. Medical and dental;
7 j. Insurance (life, health);
8 k. Entertainment;
9 l. Travel;
10 m. Incidentals;
11 n. Transportation and automobile expenses;
12 o. Car payments;
13 p. Installment payments; and
14 q. Any incidental, miscellaneous expenses, including cancelled checks
15 showing payment of said charges, and any and all bills, receipts, charge
16 account statements and charge account receipts directly relating to said
17 expenditures.
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21 **DONATIONS AND CONTRIBUTIONS**

22 27. Any and all books, receipts, records, checks, other documents or records
23 evidencing, establishing or referring to donations and contributions to any charitable,
24 religious or other institution or organization made by you or on your behalf.

25 **APPOINTMENT BOOKS/CALENDARS**

26 28. All appointment books/calendars or other documentation used by you which
27 indicate your business appointments, professional appointments, business meetings,
28
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1 travels, personal appointments, social engagements, and the like.

2 **ATTORNEY'S FEES**

3 29. Contracts, memoranda, correspondence, statements, cancelled checks and
4 any other documents reflecting fees and costs payable and otherwise relating to your
5 employment or compensation of counsel and any experts in connection with this action.
6

7 **TRANSMUTATION**

8 30. Contracts, memoranda, correspondence, notes and other documents prepared
9 by or between you and your spouse or any other person relating in any way to any
10 change in the character of property owned at any time or to be acquired by either you
11 and/or your spouse, entered into or prepared (whether or not actually executed) at any
12 time to and including the date of production.
13

14 **PROPERTY CHARACTER**

15 31. Contracts, title documents, invoices, bills, sales receipts, credit memos,
16 statements, correspondence, memoranda and any other records and writings upon which
17 you base the contention that property is community, quasi-community or separate
18 property of you and/or your spouse.
19

20 **INHERITANCE, GIFTS RECEIVED/RECEIVABLE**

21 32. All documents, including, but not limited to, wills, trust agreements, deeds and
22 any other documents, reflecting your prior or future inheritance or gift of monies or other
23 property from any person, entity, trust or estate.
24

25 **TRUSTS, ESTATES**

26 33. Trusts, trust agreements, fiduciary income tax returns, correspondence,
27 periodic accounting and any other documents relating to any trust in which you and/or
28 your spouse have or have had an interest.

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2 **GIFT TAX RETURNS, ETC.**

3 34. Gift tax returns, both state and federal, filed by you or your spouse, and any
4 other documents reflecting gifts made by you or your spouse to one another or to any
5 third person.
6

7 **TRANSFER OF PROPERTY TO OTHERS**

8 35. Any and all records pertaining to the transfer by you or on your behalf, by sale,
9 gift or otherwise, of any personal property valued in excess of \$1,000, including but not
10 limited to, invoices, sales receipts, receipt ledgers, and the like.
11

12 **PARTNERSHIP TAX RETURNS**

13 36. Partnership income tax returns, both federal and state, filed by any
14 partnership, limited partnership or joint venture in which you and/or your spouse have or
15 have had any interest, and any amendments, adjustments, extension requests and
16 correspondence relating thereto.
17

18 **CORPORATE TAX RETURNS**

19 37. Corporate income tax returns, both federal and state, filed by any corporation
20 in which you or your spouse have or have had any interest, and any amendments,
21 adjustments, extension requests and correspondence relating thereto.
22

23 **BUSINESS FINANCIAL STATEMENTS**

24 38. Financial statements, prepared on either cash basis and/or accrual basis,
25 including balance sheets and profit and loss statements, received by you or your spouse
26 with respect to or prepared by or for any proprietorship, joint venture, partnership, realty
27 trust, closely-held corporation or other business entity in which you and/or your spouse
28 have or have had an interest, including, but not limited to, any such financial statements

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1 as of (or near as possible to): (a) the date of marriage of the parties, (b) the date of
2 separation of the parties, and (c) the date of production.

3 BUSINESS BOOKS OF ACCOUNT

4 39. Books of account, general ledger, cash receipts and cash disbursement
5 journals, all subsidiary ledgers and journals and all other documents reflecting income,
6 expenses and/or assets and liabilities of any proprietorship, joint venture, partnership,
7 closely-held corporation or other legal entity in which you and/or your spouse have or
8 have had any interest.

9 CORPORATE MINUTES, ETC.

10 40. Articles of incorporation, corporate minute book, bylaws, stockholder
11 agreements and stock certificate ledgers of any corporation in which you and/or your
12 spouse have or have had any interest.

13 BUSINESS AGREEMENTS

14 41. Partnership, limited partnership, joint venture and shareholder agreements,
15 and any buy-sell or other agreements, reflecting ownership, limitations on transferability,
16 the value of any interest in any partnership, limited partnership, joint venture or corporate
17 shares in which you and/or your spouse have or have had an interest.

18 BANK RECORDS OF BUSINESS

19 42. Check registers or stubs, cancelled checks, bank statements, passbooks,
20 certificates of deposit, traveler's check and cashier's check acquisition records, client
21 trust account records and other documents reflecting deposits, withdrawals and
22 exchange of funds at any bank or financial institution having money in its possession
23 belonging to or standing in the name of any proprietorship, partnership, limited
24 partnership, joint venture or other business entity in which you and/or your spouse have

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