

This SUBPOENA/SUBPOENA DUCES TECUM TO PERSON UNDER FOREIGN SUBPOENA is being served by a private process server who must provide proof of service in accordance with Va. Code § 8.01-325.

TO the person authorized to serve this process: Upon execution, the return of this process shall be made to the Clerk of Court.

NAME: <u>Officer Tyler Hadden (I.D. 42335)</u>	
ADDRESS: <u>Southwest Community Police Station, 1546 West Martin Luther King Jr. Blvd.</u> <u>Los Angeles, CA 90062</u>	
<input type="checkbox"/> PERSONAL SERVICE	Tel. _____ No. _____
Being unable to make personal service, a copy was delivered in the following manner:	
<input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above: _____ _____	
<input type="checkbox"/> Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)	
<input type="checkbox"/> not found	_____, Sheriff
_____ DATE	by _____, Deputy Sheriff

JOHN T. FREY, CLERK
FAIRFAX COUNTY CIRCUIT COURT
4110 CHAIN BRIDGE ROAD
FAIRFAX, VIRGINIA 22030

**SUBPOENA/SUBPOENA DUCES TECUM
TO PERSON UNDER FOREIGN SUBPOENA**

File No. CL-2019-0002911

Commonwealth of Virginia VA CODE §§ 8.01-412.8—8.01-412.15; Rule 4:9

FAIRFAX COUNTY

Circuit Court

4110 CHAIN BRIDGE ROAD, FAIRFAX, VIRGINIA, 22030

ADDRESS OF COURT

JOHN C. DEPP, II

v./In re:

AMBER LAURA HEARD

TO THE PERSON AUTHORIZED BY LAW TO SERVE THIS PROCESS:

You are commanded to summon

Officer Tyler Hadden (I.D. 42335)

NAME

Southwest Community Police Station, 1546 West Martin Luther King Jr. Blvd.

STREET ADDRESS

Los Angeles

California

CITY

STATE

FILED
CIVIL INTAKE
2019 NOV 22 PM 12:09
90062
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

TO THE PERSON SUMMONED: You are commanded to

attend and give testimony at a deposition

produce the books, documents, records, electronically stored information, and tangible things designated and described below

at Brown Rudnick, 2211 Michelson Dr., 7th Fl, Irvine, CA 92612

LOCATION

at Dec. 20, 2019 at 11:00 a.m. (PT)

DATE AND TIME

and to permit inspection and copying by the requesting party or someone acting in his or her behalf of the designated items in your possession, custody or control

permit inspection of the premises

at the following location

LOCATION

on
DATE AND TIME

This subpoena is issued upon the request of the party named below

JOHN C. DEPP, II

NAME OF REQUESTING PARTY

c/o BENJAMIN G. CHEW, 601 THIRTEENTH STREET, N.W., SUITE 600

STREET ADDRESS

WASHINGTON

D.C.

20005

(202) 536-1700

CITY

STATE

ZIP

TELEPHONE NUMBER

The requesting party has submitted to this Clerk's Office the foreign subpoena, copy attached, the terms of which are incorporated herein, and the written statement required by Virginia Code § 8.01-412.10.

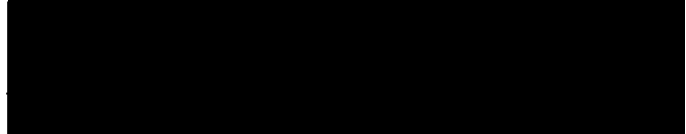
The names, addresses and telephone numbers of all counsel of record in the proceeding to which the subpoena relates and of parties not represented by counsel are provided below on attached list.

December 5th, 2019

DATE ISSUED

JOHN T. FREY, CLERK

by



BENJAMIN G. CHEW

NAME OF ATTORNEY FOR REQUESTING PARTY

601 THIRTEENTH STREET, N.W.

OFFICE ADDRESS

WASHINGTON, D.C. 20005

OFFICE ADDRESS

29113

VA

BAR NUMBER

LICENSING STATE

(202) 536-1700

TELEPHONE NUMBER OF ATTORNEY

(202) 536-1701

FACSIMILE NUMBER OF ATTORNEY

NAME

BAR NUMBER

LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

NAME

BAR NUMBER

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STREET ADDRESS

FACSIMILE NUMBER

NAME

BAR NUMBER

LICENSING STATE

STREET ADDRESS

TELEPHONE NUMBER

STREET ADDRESS

FACSIMILE NUMBER

RETURN OF SERVICE (see page three of this form)

The names, addresses and telephone numbers of all counsel of record in the proceeding to which the subpoena relates and of parties not represented by counsel are:

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): CAMILLE M. VASQUEZ (SBN 273377) BROWN RUDNICK LLP, 2211 MICHELSON DRIVE IRVINE, CA 92612 TELEPHONE NO.: 949-752-7100 FAX NO.: 949-252-1514 E-MAIL ADDRESS: cvasquez@brownrudnick.com ATTORNEY FOR (Name): Plaintiff John C. Depp, II	FOR COURT USE ONLY
Court for county in which discovery is to be conducted: SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: MAILING ADDRESS: CITY AND ZIP CODE: BRANCH NAME:	
Court in which action is pending: Name of Court: Circuit Court of Fairfax County STREET ADDRESS: 4110 Chain Bridge Road MAILING ADDRESS: 4110 Chain Bridge Road, Suite 320 CITY, STATE, AND ZIP CODE: Fairfax, Virginia 22030 COUNTRY: United States	
PLAINTIFF/PETITIONER: John C. Depp, II DEFENDANT/RESPONDENT: Amber Laura Heard	CALIFORNIA CASE NUMBER (if any assigned by court):
DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND THINGS IN ACTION PENDING OUTSIDE CALIFORNIA	CASE NUMBER (of action pending outside California): CL-2019-0002911

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Ofc. Tyler Hadden (ID 42335), Sw Community Police Station, 1546 W. Martin Luther King Jr. Blvd. Los Angeles, CA 90062

1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in this action at the following date, time, and place:

Date: Dec. 20, 2019 Time: 11:00 a.m. Address: 2211 Michelson Drive, 7th Floor, Irvine, CA 92612
--

- a. As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.230.)
 - b. You are ordered to produce the documents, electronically stored information, and things described in item 3.
 - c. This deposition will be recorded stenographically through the instant visual display of testimony and by audiotape videotape.
2. The personal attendance of the custodian or other qualified witness and the production of the original records are required by this subpoena. The procedure authorized by Evidence Code sections 1560(b), 1561, and 1562 will not be deemed sufficient compliance with this subpoena.
3. The documents, electronically stored information, and things to be produced and any testing or sampling being sought are described as follows ((if electronically stored information is required, the form or forms in which each type of information is to be produced may be specified) :

Continued on Attachment 3 (use form MC-025).

- 4. If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are described as follows:

Continued on Attachment 4 (use form MC-025).

- 5. Attorneys for the parties to this action or parties without attorneys are (name, address, telephone number, and name of party represented):

See Attachment 5

Continued on Attachment 5 (use form MC-025).

PLAINTIFF/PETITIONER: John C. Depp, II DEFENDANT/RESPONDENT: Amber Laura Heard	CASE NUMBER:
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6. Other terms or provisions from out-of-state subpoena, if any (specify):

Continued on Attachment 6 (use form MC-025).

7. If you have been served with this subpoena as a custodian of consumer or employee records under Code of Civil Procedures 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.

8. At the deposition, you will be asked questions under oath. Questions and answers are recorded stenographically at the deposition; later they are transcribed for possible use at trial. You may read the written record and change any incorrect answers before you sign the deposition. You are entitled to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition. Unless the court orders or you agree otherwise, if you are being deposed as an individual, the deposition must take place within 75 miles of your residence. The location of the deposition for all deponents is governed by Code of Civil Procedure section 2025.250.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued:

(SIGNATURE OF PERSON ISSUING SUBPOENA)

(TYPE OR PRINT NAME)

(TITLE)

PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND THINGS

1. I served this Deposition Subpoena for Personal Appearance and Production of Documents, Electronically Stored Information, and Things in Action Pending Outside California by personally delivering a copy to the person served as follows:

a. Person served (name):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. Witness fees and mileage both ways (check one):

(1) were paid. Amount: \$ _____

(2) were not paid.

(3) were tendered to the witness's public entity employer as required by Government Code section 68097.2. The amount tendered was (specify): \$ _____

f. Fee for service: \$ _____

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

3. I also served a completed Proof of Service of Notice to Consumer or Employee and Objection (form SUBP-025) by personally delivering a copy to the person served as described in 1 above.

4. Person serving:

a. Not a registered California process server

b. California sheriff or marshal

c. Registered California process server

d. Employee or independent contractor of a registered California process server

e. Exempt from registration under Business and Professions Code section 22350(b)

f. Name, address, telephone number, and, if applicable, county of registration and number:

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

Date:

(For California sheriff or marshal use only)

I certify that the foregoing is true and correct.

Date:

(SIGNATURE)

(SIGNATURE)

SHORT TITLE: John C. Depp, II v. Amber Laura Heard	CASE NUMBER:
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ATTACHMENT (Number): 5*(This Attachment may be used with any Judicial Council form.)*

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Counsel for Plaintiff John C. Depp, II

(If the item, that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 1 of 3

(Add pages as required)

SHORT TITLE: John C. Depp, II v. Amber Laura Heard	CASE NUMBER:
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ATTACHMENT (Number): 5*(This Attachment may be used with any Judicial Council form.)*

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(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 2 of 3*(Add pages as required)*

SHORT TITLE: John C. Depp, II v. Amber Laura Heard	CASE NUMBER:
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ATTACHMENT (Number): 5*(This Attachment may be used with any Judicial Council form.)*

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Counsel for Defendant Amber Laura Heard

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 3 of 3*(Add pages as required)*

SHORT TITLE: John C. Depp, II v. Amber Laura Heard	CASE NUMBER: CL-2019-0002911
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ATTACHMENT (Number): 6*(This Attachment may be used with any Judicial Council form.)*

See attached Fairfax County Circuit Court Subpoena

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 1 of 2*(Add pages as required)*

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-0002911

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the enclosed Subpoena/Subpoena Duces Tecum to Person Under Foreign Subpoena and Deposition Subpoena for Personal Appearance and Production of Documents, Electronically Stored Information, and Things In Action Pending Outside California, to be sent via email (per written agreement between the Parties), on this 22nd day of November 2019, to counsel of record.


Benjamin G. Chew (VSB No. 29113)

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Andrew C. Crawford (VSB No. 89093)
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November 22, 2019

FILED
CIVIL INTAKE
2019 NOV 22 PM 12:09
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

FILED
CIVIL INTAKE
2019 NOV 22 PM 12:00
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

VIA HAND DELIVERY

Mr. John T. Frey, Clerk
Fairfax County Circuit Court
4110 Chain Bridge Road, Suite 320
Fairfax, Virginia 22030

RE: *John C. Depp, II v. Amber Laura Heard*, No. CL-2019-0002911

Dear Mr. Frey,

Please find enclosed for filing in the above-referenced matter, original attorney-issued subpoena for deposition and documents to third party witness Officer Tyler Hadden. Also enclosed are three copies of the subpoena and a check for the Court's related certified copy fee. The subpoenas will be served in California by private process server. We request one file-stamped copy for immediate return to the courier who will deliver it to our offices. We also request one certified copy of the subpoena to be issued and served under the laws of the state of California. Upon preparation of the certified copy, please contact my paralegal Christian Seitz at (202) 536-1722 so that we may arrange for a courier to retrieve and return it to our offices.

This letter certifies that California has reciprocal privileges regarding discovery with Virginia and that I will cause copies of the subpoena to be served on counsel of record. Thank you for your assistance.

Regards,

BROWN RUDNICK LLP

Benjamin G. Chew

Enclosures