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VENABLE LLP
Michael J. O'Connor (SBN 90017)
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Telephone: (310) 229-9900
Facsimile: (310) 229-9901

*Attorneys for Non-Party
Warner Bros. Entertainment Inc.*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES**

AMBER LAURA HEARD,

Petitioner,

vs.

THE MANDEL COMPANY, INC., d/b/a
THE MANAGEMENT GROUP, a California
Corporation,

Respondent.

California Case No.: 19STCP04763

Assigned for all purposes to
Hon. Stephanie M. Bowick, Dept. 19

Case No.: CL-2019-002911
(Action Pending Outside California)

NOTICE OF RULING

Hearing Date: March 3, 2022
Time: 10:00 a.m.
Dept.: 19

JOHN C. DEPP, II,

Plaintiff and Petitioner,

vs.

AMBER LAURA HEARD,

Defendant and Respondent.

VENABLE LLP
2049 CENTURY PARK EAST, SUITE 2300
LOS ANGELES, CA 90067
310.229.9900

1 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that on March 3, 2022 at 10:00 a.m. a hearing was held in
3 Department 19 of the above-titled Court located at 111 North Hill Street, Los Angeles, California
4 90012 on Non-Party Warner Bros. Entertainment Inc.’s Motion to Quash Plaintiff’s Deposition
5 Subpoena for Personal Appearance and Production of Documents and/or Protective Order (the
6 “Motion”). Sarah Cronin and Michael O’Connor of Venable LLP appeared remotely on behalf of
7 Non-Party Warner Bros. Entertainment Inc. (“WBEI”). Samuel A. Moniz of Brown Rudnick
8 LLP appeared remotely on behalf of Plaintiff John C. Depp. Sebastian M. van Roundsburg of
9 Gordon Rees Scully Mansukhani, LLP appeared remotely on behalf of Defendant Amber Laura
10 Heard. Having considered the papers filed in support of, and in opposition to the Motion and
11 hearing oral argument, the Court ruled as follows:

- 12 • “WBEI’s Motion is GRANTED in part and DENIED in part. WBEI’s motion to
13 quash is denied, but WBEI’s motion for protective order is granted as to a 2-hour
14 limitation for John C. Depp, II and 1-hour time limitation as to Amber Laura
15 Heard, not including discussions regarding objections/subject areas explored. The
16 WBEI deposition shall be conducted on or before March 17, 2022, unless extended
17 by stipulation of the parties.”

18 A true and correct copy of the Court’s March 3, 2022 Order is attached hereto as

19 **Exhibit A.**

20 Dated: March 4, 2022

VENABLE LLP

21
22 
23 By: _____

24 Michael J. O’Connor
25 Sarah L. Cronin
26 Sarah E. Diamond

27 *Attorneys for Non-Party*
28 *Warner Bros. Entertainment Inc.*

EXHIBIT A

VENABLE LLP
2049 CENTURY PARK EAST, SUITE 2300
LOS ANGELES, CA 90067
310-229-9900

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FILED
Superior Court of California
County of Los Angeles

03/03/2022

Sherri R. Carter, Executive Officer / Clerk of Court

By: R. Duarte Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

John C. Depp, II,

Plaintiff,

v.

Amber Laura Heard,

Defendant.

California Case No.: 19STCP04763

Case No.: CL-2019-002911
(Action Pending Outside California)

**[PROPOSED] ORDER GRANTING
NON-PARTY WARNER BROS.
ENTERTAINMENT INC.'S MOTION
TO QUASH PLAINTIFF'S
DEPOSITION SUBPOENA FOR
PERSONAL APPEARANCE AND
PRODUCTION OF DOCUMENTS
AND/OR PROTECTIVE ORDER**

*[Filed concurrently with Notice of Motion
and Motion to Quash the Deposition
Subpoena for Personal Appearance and
Production of Documents and Things to
Non-Party Warner Bros. Entertainment
Inc.; Declaration of Michael J. O'Connor;
and Separate Statement]*

Hearing Date: July 19, 2022
Time: 8:30 a.m.
Dept.: 19

Res ID: 482784271483

[PROPOSED] ORDER

Non-Party Warner Bros. Entertainment Inc.'s ("WBEI") Motion to Quash Deposition Subpoena for Personal Appearance and Production of Documents and Things and/or Protective Order (the "Motion") came on for hearing on July 19, 2022 at 8:30 a.m., in Department 19 of the above-captioned Court. Having read and considered the Motion, the opposition, and reply memoranda, the admissible evidence submitted by the parties, and all related submissions, having heard the arguments of counsel, and good cause appearing,

IT IS HEREBY ORDERED:

WBEI's Motion is **GRANTED**

Dated: 03/03/2022

Hon. Stephanie M. Bowick
Judge of the Superior Court

VENABLE LLP
2049 CENTURY PARK EAST, SUITE 2300
LOS ANGELES, CA 90067
310-229-9900

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PROOF OF SERVICE

STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES) ss.

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is Venable LLP, 2049 Century Park East, Suite 2300, Los Angeles, California.

On **February 18, 2022**, I served a copy / original of the foregoing document(s) described as **[PROPOSED] ORDER GRANTING NON-PARTY WARNER BROS. ENTERTAINMENT INC.’S MOTION TO QUASH PLAINTIFF’S DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS AND/OR PROTECTIVE ORDER** on the interested parties in this action addressed as follows:

Camille M. Vasquez, Esq.
Samuel A. Moniz, Esq.
BROWN RUDNICK LLP
2211 Michelson Drive, Seventh Floor
Irvine, CA 92612
Phone: (949) 752.7100
Facsimile: (949) 252-1514
CVasquez@brownrudnick.com
SMoniz@brownrudnick.com
Attorneys for Plaintiff JOHN C. DEPP, II

Benjamin Chew, Esq. (VIA EMAIL ONLY)
bchew@brownrudnick.com
Attorney for Plaintiff JOHN C. DEPP, II

Craig J. Mariam, Esq.
Michael J. Dailey, Esq.
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Attorneys for Defendant and Counterclaim Plaintiff AMBER LAURA HEARD

Elaine Bredehoft, Esq. (VIA EMAIL ONLY)
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Clarissa Pintado, Esq. (VIA EMAIL ONLY)
cpintado@cbcblaw.com
Attorneys for Defendant and Counterclaim Plaintiff AMBER LAURA HEARD

By directing the placement of true copies thereof enclosed in a sealed envelope(s) addressed as stated above.

BY MAIL (CCP §1013(a)&(b)): I am readily familiar with the firm’s practice of collection and processing correspondence for mailing with the U.S. Postal Service. Under that practice such envelope(s) is deposited with the U.S. postal service on the same day this declaration was executed, with postage thereon fully prepaid at 2049 Century Park East, Suite 2300, Los Angeles, California, in the ordinary course of business.

BY EMAIL (CCP § 1010.6; CRC Rule 2.251(g)): I transmitted the above-stated document(s) and a copy of this declaration from my computer (electronic notification address KMTjaden@Venable.com located at Venable LLP, 2049 Century Park East, Suite 2300, Los Angeles, California 90067 to the interested parties in this action whose names and e-mail addresses are listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. Service by e-mail or

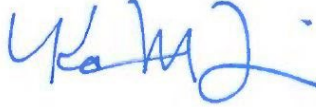
VENABLE LLP
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electronic transmission was agreed upon based on a court order or an agreement of the parties to accept service.

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

Executed on **February 18, 2022**, at Los Angeles, California.



Karen M. Tjaden

PROOF OF SERVICE

1
2 STATE OF CALIFORNIA)
3 COUNTY OF LOS ANGELES) ss.

4 I am employed in the County of Los Angeles, State of California. I am over the age of 18
5 and not a party to the within action; my business address is Venable LLP, 2049 Century Park
East, Suite 2300, Los Angeles, California.

6 On **March 4, 2022**, I served a copy / original of the foregoing document(s)
7 described as **NOTICE OF RULING** on the interested parties in this action addressed as follows:

8 Camille M. Vasquez, Esq.
9 Samuel A. Moniz, Esq.
10 Honieh Udenka, Esq.
11 BROWN RUDNICK LLP
12 2211 Michelson Drive, Seventh Floor
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13 Phone: (949) 752.7100
Facsimile: (949) 252-1514
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Attorneys for Plaintiff JOHN C. DEPP, II

14 Benjamin G. Chew, Esq.
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*Attorneys for Defendant and
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HEARD*

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ebredehoft@charlsonbredehoft.com
cpintado@cbcblaw.com

*Attorneys for Defendant and
Counterclaim Plaintiff AMBER LAURA
HEARD*

20
21 By directing the placement of true copies thereof enclosed in a sealed envelope(s)
22 addressed as stated above.

23 **BY MAIL (CCP §1013(a)&(b)):** I am readily familiar with the firm's practice of
24 collection and processing correspondence for mailing with the U.S. Postal Service.
25 Under that practice such envelope(s) is deposited with the U.S. postal service on
the same day this declaration was executed, with postage thereon fully prepaid at
2049 Century Park East, Suite 2300, Los Angeles, California, in the ordinary
course of business.

26 **BY EMAIL (CCP § 1010.6; CRC Rule 2.251(g)):** I transmitted the above-stated
27 document(s) and a copy of this declaration from my computer (electronic
notification address ***KMTjaden@Venable.com*** located at Venable LLP, 2049
28 Century Park East, Suite 2300, Los Angeles, California 90067 to the interested
parties in this action whose names and e-mail addresses are listed above. I did not

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receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. Service by e-mail or electronic transmission was agreed upon based on a court order or an agreement of the parties to accept service.

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

Executed on **March 4, 2022**, at Los Angeles, California.



Karen M. Tjaden