

# EXHIBIT 1

**Meyers, Jessica N.**

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**From:** Meyers, Jessica N.  
**Sent:** Wednesday, March 10, 2021 3:13 PM  
**To:** Schwartz, Michael (x2252); Chew, Benjamin G.  
**Cc:** Crawford, Andrew C.; Vasquez, Camille M.; Teplin, Stephanie (x2543)  
**Subject:** RE: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)  
**Attachments:** 2021-02-04 Depp\_s Subpoena to Corporate Designee of American Civil Liberties Union Foundation (Issued) (Mar. 5, 2021).PDF; 2021-02-04 Depp\_s Subpoena Duces Tecum to American Civil Liberties Union Foundation (Issued) (Mar. 1, 2021).PDF

Michael, Stephanie,

As discussed on our call last Friday, attached please find the subpoenas *duces tecum* and *ad testificandum* to the ACLU Foundation that were previously served on Abdi Soltani on February 11, 2021. Although we believe these have already been validly served, please confirm that you will, as stated below, also accept service of the attached subpoenas. We, of course, are willing to renegotiate the compliance dates for the subpoenas, which have passed at this point.

Please let us know your availability for a call this coming Monday, March 15, 2021 to discuss the attached subpoenas and the outstanding items with respect to the subpoena to Mr. Wizner. If we can first agree to date(s) for the production of documents pursuant to the subpoenas, I believe we can hold off on scheduling any deposition until after we have had an opportunity to review the produced materials.

Best,  
Jess

**brownrudnick**

**Jessica N. Meyers**

Counselor at Law

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New York, NY 10036  
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**From:** Schwartz, Michael (x2252) <[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)>  
**Sent:** Wednesday, March 3, 2021 4:03 PM  
**To:** Chew, Benjamin G. <[BChew@brownrudnick.com](mailto:BChew@brownrudnick.com)>  
**Cc:** Crawford, Andrew C. <[ACrawford@brownrudnick.com](mailto:ACrawford@brownrudnick.com)>; Vasquez, Camille M. <[CVasquez@brownrudnick.com](mailto:CVasquez@brownrudnick.com)>; Meyers, Jessica N. <[JMeyers@brownrudnick.com](mailto:JMeyers@brownrudnick.com)>; Teplin, Stephanie (x2543) <[steplin@pbwt.com](mailto:steplin@pbwt.com)>  
**Subject:** RE: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

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Yes, I'd appreciate if you could send a calendar invite and dial-in. Please include my colleague Stephanie Teplin.

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**Michael D. Schwartz**

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**From:** Chew, Benjamin G. <[BChew@brownrudnick.com](mailto:BChew@brownrudnick.com)>

**Sent:** Wednesday, March 3, 2021 3:11 PM

**To:** Schwartz, Michael (x2252) <[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)>

**Cc:** Crawford, Andrew C. <[ACrawford@brownrudnick.com](mailto:ACrawford@brownrudnick.com)>; Vasquez, Camille M. <[CVasquez@brownrudnick.com](mailto:CVasquez@brownrudnick.com)>; Meyers, Jessica N. <[JMeyers@brownrudnick.com](mailto:JMeyers@brownrudnick.com)>; Teplin, Stephanie (x2543) <[steplin@pbwt.com](mailto:steplin@pbwt.com)>

**Subject:** John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

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Dear Mike,

Thanks for your response.

Let's speak at 10:00 a.m. Friday. With your leave I will send a call-in number in case any of your colleagues wish to join the call. (Ms. Meyers and perhaps Ms. Vasquez will be joining me for Mr. Depp.)

I take it from your contention concerning service that the Foundation will NOT be appearing this Friday, so, unless you state otherwise, I will apprise Ms. Heard's counsel that has been postponed. Without agreeing with your client's contention concerning lack of service, we appreciate your offer and will re-serve the Foundation through you forthwith. Our desire is not to fight, but to simply get the information we need with as little cost and disruption for all concerned.

Look forward to speaking with you Friday morning.

Best regards,

Ben

**brownrudnick**

**Benjamin G. Chew**

Partner

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**From:** Schwartz, Michael (x2252) <[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)>  
**Sent:** Wednesday, March 3, 2021 3:05 PM  
**To:** Chew, Benjamin G. <[BChew@brownrudnick.com](mailto:BChew@brownrudnick.com)>  
**Cc:** Crawford, Andrew C. <[ACrawford@brownrudnick.com](mailto:ACrawford@brownrudnick.com)>; Vasquez, Camille M. <[CVasquez@brownrudnick.com](mailto:CVasquez@brownrudnick.com)>; Meyers, Jessica N. <[JMeyers@brownrudnick.com](mailto:JMeyers@brownrudnick.com)>; Teplin, Stephanie (x2543) <[steplin@pbwt.com](mailto:steplin@pbwt.com)>  
**Subject:** RE: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

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Ben,

Thank you for your email. We do also represent the ACLU Foundation, however the ACLU Foundation has not been served with a subpoena in this matter. We have conferred with our client and we are authorized to accept electronic service of a properly-issued New York subpoena on the ACLU Foundation.

We are available to speak regarding the Wizner subpoena on Friday from 10:00-11:30 or 1:00-3:00, or next Monday from 11:00-1:30. Please let us know if either day works for you.

Regards,  
Mike

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**Michael D. Schwartz**  
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**From:** Chew, Benjamin G. <[BChew@brownrudnick.com](mailto:BChew@brownrudnick.com)>  
**Sent:** Wednesday, March 3, 2021 1:19 PM  
**To:** Schwartz, Michael (x2252) <[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)>  
**Cc:** Crawford, Andrew C. <[ACrawford@brownrudnick.com](mailto:ACrawford@brownrudnick.com)>; Vasquez, Camille M. <[CVasquez@brownrudnick.com](mailto:CVasquez@brownrudnick.com)>; Meyers, Jessica N. <[JMeyers@brownrudnick.com](mailto:JMeyers@brownrudnick.com)>; Teplin, Stephanie (x2543) <[steplin@pbwt.com](mailto:steplin@pbwt.com)>  
**Subject:** FW: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

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Good afternoon, Michael,

We had some issues with our email yesterday, so am resending to make sure you received. Please confirm.

Best regards,

Ben

**brownrudnick**

**Benjamin G. Chew**

Partner

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Fellow,  
American College  
of Trial Lawyers

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**From:** Chew, Benjamin G. [<mailto:BChew@brownrudnick.com>]

**Sent:** Tuesday, March 02, 2021 12:48 PM

**To:** Schwartz, Michael (x2252); Crawford, Andrew C.; Vasquez, Camille M.; Meyers, Jessica N.

**Cc:** Teplin, Stephanie (x2543)

**Subject:** John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

Dear Mike,

Thanks for your message.

Three quick questions:

1. Are you also representing the ACLU Foundation, Inc., which Mr. Depp also served with a subpoena?
2. To the extent you don't, do you know who does represent that entity?
3. Might you be available to meet and confer with respect to your objections on behalf of Mr. Wizner sometime tomorrow (except between 4:15 and 5:00 p.m. EST) or Thursday? We would also like to discuss a mutually convenient date for that deposition.

Look forward to your response.

Best regards,

Ben

**brownrudnick**

**Benjamin G. Chew**

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**From:** Schwartz, Michael (x2252) [<mailto:mschwartz@pbwt.com>]  
**Sent:** Monday, March 01, 2021 1:03 PM  
**To:** Chew, Benjamin G.; Crawford, Andrew C.; Vasquez, Camille M.; Meyers, Jessica N.  
**Cc:** Teplin, Stephanie (x2543); [ebredehoft@cbclaw.com](mailto:ebredehoft@cbclaw.com)  
**Subject:** John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)

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Counsel:

We represent Non-Party Benjamin Wizner in connection with the two foreign subpoenas he received in the above-captioned matter, both dated February 1, 2021. Please see attached letter and written responses & objections. These documents are also being sent via Fedex to Jessica Meyers at her New York office address.

Regards,  
Mike Schwartz

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