

# **Exhibit F**

**Schwartz, Michael (x2252)**

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**From:** Teplin, Stephanie (x2543)  
**Sent:** Friday, April 2, 2021 12:25 PM  
**To:** Meyers, Jessica N.; Schwartz, Michael (x2252); Crawford, Andrew C.; Chew, Benjamin G.; Vasquez, Camille M.; Elaine Bredehoft  
**Subject:** RE: John C. Depp, II v. Amber Laura Heard, Originating Case No. CL-2019-23911 (V.A. Cir. Ct. Fairfax Cnty.)  
**Attachments:** Justice Masley stipulation.pdf; Justice Schecter stipulation.pdf; NYC Bar Confidentiality Order ModelConfidentiality.pdf

Jess,

We write to respond to your objections to our proposed confidentiality agreement, which we are happy to discuss further during our meet-and-confer on Monday.

First, we disagree that courts have not recognized confidential treatment as appropriate for the categories of documents listed in our proposal. Attached are model confidentiality agreements from Justices Masley and Schecter of the New York Supreme Court and from the New York City Bar Association. All three models include a definition of "confidential" very similar to our proposal. If you are unwilling to agree to our proposed definition of "confidential," we would be fine with adopting the definition in these models. Second, we are unclear why you will not agree to limit the use of produced documents to the Virginia Litigation, since the only purpose of issuing a subpoena is to obtain documents to be used in the litigation from which the subpoena is issued.

We'd like to resolve these issues promptly so that we can stick to our April 9 target date for production. We will not produce any documents without an adequate protective agreement in place.

Have a good weekend and look forward to speaking on Monday afternoon,

Stephanie

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**From:** Meyers, Jessica N. <[JMeyers@brownrudnick.com](mailto:JMeyers@brownrudnick.com)>  
**Sent:** Tuesday, March 30, 2021 3:03 PM  
**To:** Schwartz, Michael (x2252) <[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)>; Crawford, Andrew C. <[ACrawford@brownrudnick.com](mailto:ACrawford@brownrudnick.com)>; Chew, Benjamin G. <[BChew@brownrudnick.com](mailto:BChew@brownrudnick.com)>; Vasquez, Camille M. <[CVasquez@brownrudnick.com](mailto:CVasquez@brownrudnick.com)>; Elaine Bredehoft <[ebredehoft@charlsonbredehoft.com](mailto:ebredehoft@charlsonbredehoft.com)>  
**Cc:** 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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Hi Mike,

We have considered the supplemental confidentiality protections you have proposed for the ACLU witnesses' contemplated document productions. We are willing to expand "confidential" information to include information protected from disclosure by statute, trade secrets, and proprietary business information, to address the confidentiality concerns of the ACLU organization. We cannot, however, agree to the other categories of information for which you

seek confidential treatment, as these go beyond the categories of information for which New York and Virginia courts have recognized confidential treatment is appropriate. We also cannot agree to the additional limitations on the use of non-confidential information that you propose.

We are, of course, willing to meet and confer to try to come to a mutually-agreeable arrangement to address the ACLU witnesses' confidentiality concerns. I would propose we add this to the agenda for our 3:30pm call on April 5<sup>th</sup>. If you would like to provide a counterproposal in the meantime, we are happy to consider it and will be prepared to discuss on the 5<sup>th</sup>.

Best,  
Jess

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**From:** Meyers, Jessica N.

**Sent:** Thursday, March 25, 2021 2:36 PM

**To:** Schwartz, Michael (x2252) <[mschwartz@pbwt.com](mailto:mschwartz@pbwt.com)>; Crawford, Andrew C. <[ACrawford@brownrudnick.com](mailto:ACrawford@brownrudnick.com)>; Chew, Benjamin G. <[BCheW@brownrudnick.com](mailto:BCheW@brownrudnick.com)>; Vasquez, Camille M. <[CVasquez@brownrudnick.com](mailto:CVasquez@brownrudnick.com)>; Elaine Bredehoft <[ebredehoft@charlsonbredehoft.com](mailto:ebredehoft@charlsonbredehoft.com)>

**Cc:** 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.)

Thank you, Mike. We will review your proposal and get back to you shortly with our position.

Best,  
Jess

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

**Sent:** Thursday, March 25, 2021 10:35 AM

**To:** Meyers, Jessica N. <[JMeyers@brownrudnick.com](mailto:JMeyers@brownrudnick.com)>; Crawford, Andrew C. <[ACrawford@brownrudnick.com](mailto:ACrawford@brownrudnick.com)>; Chew, Benjamin G. <[BCheW@brownrudnick.com](mailto:BCheW@brownrudnick.com)>; Vasquez, Camille M. <[CVasquez@brownrudnick.com](mailto:CVasquez@brownrudnick.com)>; Elaine Bredehoft <[ebredehoft@charlsonbredehoft.com](mailto:ebredehoft@charlsonbredehoft.com)>

**Cc:** 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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Counsel,

We have reviewed the Protective Order entered in the underlying Virginia litigation. We're generally comfortable with its terms, but would like a couple additional protections which are set forth in the attached draft letter agreement. These additions address the different confidentiality concerns of an organization as opposed to those of the individual parties in the litigation. Please let us know if this agreement is acceptable. I am also including Ms. Heard's counsel, as we would like both parties to the litigation to join this agreement.

Thanks,  
Mike

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**Michael D. Schwartz**

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