

EXHIBIT 2

Meyers, Jessica N.

From: Meyers, Jessica N.
Sent: Friday, March 26, 2021 2:42 PM
To: Schwartz, Michael (x2252); Crawford, Andrew C.; Chew, Benjamin G.; Vasquez, Camille M.
Cc: 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.)

Mike,

I strongly disagree with your characterization of our past discussions. Both Camille and I explained the relevance of documents related to donations purportedly made to the ACLU by or on behalf of Ms. Heard and the documents related to the preparation of Mr. Wizner's declaration. I believe we also identified court orders from the Virginia and California courts finding that information related to Ms. Heard's purported donation of her divorce settlement is relevant to this action. I understand that you disagree with our explanation of the relevance, but to say that we were "unable to articulate the relevance" is inaccurate. If you would like to us to explain it to you again, we are prepared to do so.

Also, on our last call I thought we were clear that, in our view, there is relevant information missing from Ms. Heard's document productions related to her purported ACLU donation. We will be prepared to discuss in greater detail what type of information we believe is missing from Ms. Heard's production on our call on April 5th.

Let's plan to speak at 3:30pm on April 5th. I will circulate a calendar invite and dial in.

Best,
Jess

From: Schwartz, Michael (x2252) <mschwartz@pbwt.com>
Sent: Friday, March 26, 2021 1:19 PM
To: Meyers, Jessica N. <JMeyers@brownrudnick.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>; Chew, Benjamin G. <BChew@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>
Cc: Teplin, Stephanie (x2543) <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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Jess,

We are disappointed to hear that you intend to engage in motion practice given the ACLU and Mr. Wizner's agreement to provide documents related to the op-ed that is the subject of the defamation action. We are available to meet-and-confer on April 5 at 3pm or later.

While we are certainly open to further discussion, we note that on our previous call you were unable to articulate the relevance of documents related to donations to the ACLU, or documents related to the drafting of Mr. Wizner's declaration. We also asked you to explain if there were particular documents or information you believed were missing from productions made by the parties, or if you were simply looking to authenticate documents that had already been produced. Our call on April 5 would be more productive if you are prepared to answer those questions so that we can discuss your positions with our clients.

Regards,
Mike

Michael D. Schwartz

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From: Meyers, Jessica N. <JMeyers@brownrudnick.com>

Sent: Thursday, March 25, 2021 2:34 PM

To: Schwartz, Michael (x2252) <mschwartz@pbwt.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>; Chew, Benjamin G. <BCheW@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>

Cc: Teplin, Stephanie (x2543) <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,

Thank you, we are in receipt of the ACLU Foundation's responses and objections to the document and deposition subpoenas.

Based on our review of the ACLU Foundation's and Mr. Wizner's responses and objections to their respective subpoenas, as well as the discussions on our prior meet and confers, we anticipate moving to compel fulsome compliance with these subpoenas. We understand that you are in the process of collecting documents responsive to certain requests directed to the ACLU Foundation and Mr. Wizner for production on April 9, 2021. Accordingly, we put you on notice that we intend to move to compel the production of documents responsive to the requests that the ACLU Foundation and/or Mr. Wizner objected to in whole or in part so that you have the opportunity to take this into account in the document collection process.

We understand that you will be serving Mr. Romero's responses and objections to the document and deposition subpoenas directed to him on April 2, 2021 and anticipate, based on the ACLU Foundation's and Mr. Wizner's responses and objections, that we will need to move to compel more fulsome discovery from Mr. Romero as well. We, thus, request a meet and confer to occur after Mr. Romero's responses and objections have been served so that we can try, again, to resolve the ACLU parties' objections to their respective subpoenas before we move to compel. Please let us know your availability for a meet and confer on April 5, 2021.

Best,
Jess

From: Schwartz, Michael (x2252) <mschwartz@pbwt.com>

Sent: Wednesday, March 24, 2021 5:34 PM

To: Meyers, Jessica N. <JMeyers@brownrudnick.com>; Crawford, Andrew C. <ACrawford@brownrudnick.com>; Chew,

Benjamin G. <BChew@brownrudnick.com>; Vasquez, Camille M. <CVasquez@brownrudnick.com>
Cc: Teplin, Stephanie (x2543) <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,

Attached please find non-party American Civil Liberties Union Foundation's responses and objections to the Subpoena Duces Tecum and the Subpoena Ad Testificandum, both dated February 1, 2021.

Regards,
Mike

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