## VIRGINIA:

COURT SERVICES

IN THE CIRCUIT COURT OF FAIRFAX COUNTY 2019 MAY 20 AM 9: 22

JOHN C. DEPP, II

CLERK, CIRCUIT COURT FAIRFAX, VA

Plaintiff,

٧.

Civil Action No.: CL-2019-0002911

AMBER LAURA HEARD

Defendant.

## CONSENT MOTION TO ADMIT PRO HAC VICE CAMILLE M. VASQUEZ AS CO-COUNSEL FOR PLAINTIFF

Pursuant to Rule 1A:4 of the Rules of the Supreme Court of Virginia, undersigned counsel, who is a member in good standing of the Bar of this Court and the Commonwealth of Virginia, requests that this Court admit *pro hac vice* Camille M. Vasquez, attorney in good standing with California, to serve as associate counsel for the Plaintiff John C. Depp, II in the above titled action. In support of this Motion, undersigned counsel respectfully represents the following:

- 1. Camille M. Vasquez is an attorney with the law firm of Brown Rudnick, LLP ("Brown Rudnick") with a principal office located in Boston, Massachusetts and satellite offices located in various locations, including Irvine, California.
- 2. Ms. Vasquez primarily works out of the Brown Rudnick office with the following address and contact information: 2211 Michelson Drive, Seventh Floor, Irvine, CA 92612—Telephone: (949) 752-7100.
  - 3. Ms. Vasquez is an attorney in good standing in the California, admitted to practice before the courts in California, as detailed further within the respective sworn Applications for Admission *Pro Hac Vice* attached hereto as Exhibits A and B. The required

application fee has been submitted along with this Motion for each Application as required by Rule 1A:4 of the Rules of the Supreme Court of Virginia.

- 4. Ms. Vasquez has not been disciplined by any Bar of any state nor has she been sanctioned by any court.
- 5. Ms. Vasquez has not sought admission *pro hac vice* in the courts of the Commonwealth of Virginia in the last twelve months.
- 6. The undersigned moves that Camille M. Vasquez be permitted to appear in this Court as *pro hac vice* counsel on behalf of Plaintiff John C. Depp, II for all purposes permitted under the Rules of the Supreme Court of Virginia.
- 7. Undersigned local counsel, Benjamin G. Chew, is a member in good standing of the Bar of the Commonwealth of Virginia and at least one shall sign all pleadings and personally appear in all proceedings conducted before this Court.

WHEREFORE, the undersigned moves this Court for an Order admitting Camille M.

Vasquez, pro hac vice, for the limited purpose of appearing and participating in this action as pro hac vice counsel for Plaintiff John C. Depp, II.

Dated: May 20, 2019

Respectfully submitted,

By:

Benjamin G. Chew (VSB No. 29113)

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Counsel for Plaintiff John C. Depp, II

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 20th day of May 2019, I served the foregoing via First Class Mail (postage prepaid) and electronic mail upon the following:

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