### VIRGINIA:

MOT DOCKET 2021 NOV 24 AM II: 03

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

THE CIRCUIT COURT OF PAIRPAX COUNTY,

Î JOHN T. FREY CLERK, CIRCU'T COUR FAIRFAX, VA

JOHN C. DEPP, II,

Plaintiff and Counterclaim-Defendant,

v.

Civil Action No.: CL-2019-0002911

AMBER LAURA HEARD,

Defendant and Counterclaim-Plaintiff.

# DEFENDANT AND COUNTERCLAIM-PLAINTIFF AMBER LAURA HEARD'S MOTION TO COMPEL RESPONSES TO ELEVENTH AND TWELFTH REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF AND COUNTERCLAIM-DEFENDANT JOHN C. DEPP, II

COMES NOW Defendant and Counterclaim-Plaintiff Amber Laura Heard ("Ms. Heard"), by counsel, in accordance with Rule 4:12 of the Rules of the Supreme Court of Virginia, and moves this Court for entry of an Order compelling Plaintiff and Counterclaim-Defendant John C. Depp II to fully produce non-privileged documents in response to Defendant and Counterclaim Plaintiff's Eleventh and Twelfth Sets of Requests for Production of Documents.

The grounds for this Motion are set forth in the accompanying Memorandum.

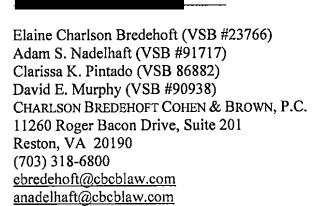
## **CERTIFICATE UNDER RULE 4:12(A)(2)**

Pursuant to Va. Sup. Ct. R's 4:1(b)(8) and 4:15(b), Defendant and Counterclaim-Plaintiff, by counsel, certifies that she has conferred with counsel for Plaintiff and Counterclaim-Defendant in an effort to resolve the issues addressed in this Motion prior to placing it on the docket, and has complied with all procedures in the Conciliator Protocol Order.

November 24, 2021

# Respectfully submitted,

cpintado@cbcblaw.com dmurphy@cbcblaw.com



J. Benjamin Rottenborn (VSB #84796)
Joshua R. Treece (VSB #79149)
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
(540) 983-7540
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel to Defendant and Counterclaim-Plaintiff, Amber Laura Heard

### **CERTIFICATE OF SERVICE**

I certify that on this 24<sup>th</sup> day of November, 2021, a copy of the foregoing was served by email, by agreement of the parties, addressed as follows:

Benjamin G. Chew, Esq.
Andrew C. Crawford, Esq.
BROWN RUDNICK LLP
601 Thirteenth Street, N.W.
Washington, D.C. 20005
Telephone: (202) 536-1700
Facsimile: (202) 536-1701
bchew@brownrudnick.com
acrawford@brownrudnick.com

Camille M. Vasquez, Esq.
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514
cvasquez@brownrudnick.com

Counsel for Plaintiff and Counterclaim-Defendant, John C. Depp, II

