

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counterclaim-Defendant,

v.

AMBER LAURA HEARD,

Defendant and Counterclaim-Plaintiff.

Civil Action No.: CL-2019-0002911

FILED
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2021 NOV 24 AM 11:03
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

**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,



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CERTIFICATE OF SERVICE

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

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A large black rectangular redaction box covering the signature area of David E. Murphy.

David E. Murphy