Computer   Computer   Civil Action No.   CL2019-02911	VIRGINIA:	IN THE CIRCU	IT COURT OF F	AIRFAX CO	DUNTY	
AMBER LAURA HEARD JOHN T. FREY.  Defendant CLERK, CIRCUIT COURT FAIRFAX, VA  FRIDAY MOTIONS DAY - PRAECIPE/NOTICE  Moving Party: Plaintiff x Defendant Other  Title of Motion: DEMURRER AND PLEA IN BAR Attached X Previously Filed (As Attachment to 9/5/19 Motion for Leave)  DATE TO BE HEARD: 11/22/2019 (if Leave is Granted) Time Estimate (combined no more data 30 minutes): 30 Min  Time to be Heard: 9:00 a.m. with a Judge 9:00 a.m. without a Judge  X 10:00 a.m. (Civil Action Cases) Does this motion require 2 weeks notice? Yes No  11:30 a.m. (DOMESTIC/Family Law Cases) Does this motion require 2 weeks notice? Yes No  Case continued from: continued to: (Date)  Moving party will use Court Call telephonic appearance: Yes X No  Judge Bruce D. White must hear this motion because (check one reason below):  The matter is on the docket for presentation of an order reflecting a specific ruling previously made by that Judge. X This Judge has been assigned to this entire case by the Chief Judge; or,  The Judge has advised counsel that all future motions, or this specific motion, should be placed on this Judge's Docket; or,  This matter concerns a demurrer filed in a case where that Judge previously granted a demurrer in favor of demurran Praeciple by: Joshua R. Treece, Esq./ Amber Laura Heard WOODS ROGERS PLC  Firm Name		JOHN C. DEPP.	II / CUED	· · · · · · · · · · · · · · · · · · ·		
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Printed Attorney Name/ Moving Party Name Firm Name	• •	erns a demurrer filed	d in a case where tha	t Judge previo	usly granted a der	nurrer in favor of demurrant.
10.5 Jefferson Street Suite 1400 P.O. Roy 14125 Roanoka Virginia 24011	ŀ	rinted Attorney Name/ Mov	ving Party Name		Firm No	ame
Address	10 S. Jefferso	on Street, Suite 140		5, Roanoke, V	rirginia 24011_	all the second restrict
<u>504-983-7730</u> <u>540-983-7711</u> <u>79149</u> <u>jtreece@woodsrogers.com</u>						rs.com
Tel. No. Fax No. VSB No. E-Mail Address	Tel. No.	Fax No.	VSB No.	E-	Mail Address	
CERTIFICATIONS  I certify that I have in good faith conferred or attempted to confer with other affected parties in an effort to resolve the subject of the motion without Court action, pursuant to Rule 4:15(b) of the Rules of the Supreme Court of Virginia; and, I have read, and complied with, each of the Instructions for Moving Party on the reverse side of this form.	subject of the motion w	ithout Court action,	or attempted to conf pursuant to Rule 4:1	er with other a 5(b) of the Ru	les of the Suprem he reverse side of	e Court of Virginia; <u>and</u> , this form.
CERTIFICATE OF SERVICE			CERTIFICATE	OF SERVICE	wroving Pa	nty/Counsel of Recold
I certify on the 4th day of October , 2019 , a true copy of the foregoing Practipe was	I certify on the _4th_ da	ay of <u>October</u>	2019	, a true cop	y of the foregoing	Praecipe was
<u>X</u> mailed <u>X</u> emailed <u>delivered to all counsel of record pursuant to the provisions of Rule 4:15(e) of the Rule of the Supreme Court of Virginia.</u>		emaileddeliver	red to all counsel of	record pursuan	t to the provision	s of Rule 4:15(e) of the Rules
Moving Party/Counsel of Record	of the Supreme Court of	f Virginia.		8		



JOSHUA R. TREECE (540) 983-7730 jtreece@woodsrogers.com

October 4, 2019

## VIA OVERNIGHT MAIL

Fairfax Circuit Court Attn: Clerk's Office, 3rd Floor 4110 Chain Bridge Road Fairfax, VA 22030 COMPUTER SECTION

2019 OCT -7 AM 11: 1,9

CLERK, CIRCUIT COURT
FAIRFAX, VA

Re: Joh

John C. Depp II v. Amber Laura Heard; Case No. 2019-02911;

November 8, 2019 Praecipe/Notice for Defendant's Motion for Leave to File

Amended Responsive Pleadings;

November 22, 2019 Praecipe/Notice for Defendant's Demurrer & Plea in Bar

Dear Clerk:

Enclosed for filing, please find Defendant's Praecipe/Notice for Defendant's Motion for Leave to File Amended Responsive Pleadings (the "Motion for Leave"). The hearing for the Motion for Leave is being noticed for November 8, 2019, Judge White's first available Friday Motions Day after October 11, 2019.

We are also enclosing for filing, Defendant's Praecipe/Notice for Defendant's Demurrer and Plea in Bar, in the event leave is granted. The hearing for the Demurrer and Plea in Bar is being noticed for November 22, 2019, a date on which Plaintiff's counsel stated they were available, in the event leave is granted.

In advance the hearing on the Demurrer and Plea in Bar, we will work with Plaintiff's counsel and calendar control, as appropriate, to address briefing matters and discuss whether a longer hearing is required, but given the fast-approaching trial date, we wanted to reserve November 22, 2019 for a hearing on the Demurrer and Plea in Bar.

I am also enclosing one (1) copy of each Praecipe submitted herewith. If you would, please file stamp each and return them in the enclosed, prepaid and self-addressed envelope.

Thank you for your assistance and do not hesitate to contact me if you have any questions or concerns.

Sincerely,

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WOODS ROGERS PLC

Goshua R. Treece

Enclosures

cc: Counsel of Record