

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

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JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

JOHN C. DEPP, II

*Plaintiff,*

v.

AMBER LAURA HEARD,

*Defendant.*

Civil Action No.: CL-2019-0002911

**PLAINTIFF'S MOTION TO COMPEL EXECUTION OF HIPAA RELEASES**

Plaintiff John C. Depp, II, by and through his undersigned counsel, hereby moves this Honorable Court to compel the execution of a Health Insurance Portability and Accountability Act ("HIPAA") waiver by Defendant Amber L. Heard. In support of this motion, Mr. Depp states as follows:

- (1) Counsel for Mr. Depp hereby certifies that they have in good faith conferred with counsel for Ms. Heard in an effort to obtain the requested HIPAA releases without court action.
- (2) Ms. Heard has refused to produce the requested HIPAA releases.
- (3) Mr. Depp requests entry of an order compelling Ms. Heard to provide a blanket HIPAA waiver.

A memorandum in support of this motion and proposed Order are filed herewith for the Court's consideration.

Dated: June 12, 2020

Respectfully submitted,



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