VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY ROCESSING

JOHN C. DEPP, II

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Plaintiff and Counterclaim Defendant,

JOHN T. FREY

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Civil Action No.: CL-2019-0002911

AMBER LAURA HEARD

Defendant and Counterclaim Plaintiff.

CONSENT MOTION TO ADMIT PRO HAC VICE STEPHANIE CALNAN 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 Stephanie Calnan, attorney in good standing within the Commonwealth of Massachusetts and state of New York, to serve as associate counsel for Plaintiff and Counterclaim Defendant John C. Depp, II in the above titled action. In support of this Motion, undersigned counsel respectfully represents the following:

- 1. Stephanie Calnan is an attorney with the law firm Brown Rudnick LLP ("Brown Rudnick") with a principal office located in Boston, MA.
- 2. Ms. Calnan works out of the Brown Rudnick office with the following address and contact information: One Financial Center, Boston, MA 02111 - Telephone: (617) 856-8200.
- 3. Ms. Calnan is an attorney in good standing in the Commonwealth of Massachusetts and state of New York, admitted to practice before the courts of the Commonwealth of Massachusetts and state of New York, as detailed further within the sworn and notarized Application to Appear Pro Hac Vice Before a Virginia Tribunal attached hereto as

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

- 4. Ms. Calnan has not been disciplined by any Bar of any state nor has she been sanctioned by any court.
- 5. Ms. Calnan 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 Stephanie Calnan be permitted to associate with local counsel and appear in this Court as *pro hac vice* counsel on behalf of Plaintiff and Counterclaim Defendant John C. Depp, II for all purposes permitted under the Rules of the Supreme Court of Virginia.
- 7. Undersigned local counsel, Benjamin G. Chew and Andrew C. Crawford, are members 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.
- 8. Counsel for Defendant and Counterclaim Plaintiff Amber Laura Heard have consented to the application and admission of Ms. Calnan.

WHEREFORE, the undersigned moves this Court for an Order admitting Stephanie Calnan, pro hac vice, for the limited purpose of appearing and participating in this action as pro hac vice counsel for Plaintiff and Counterclaim Defendant John C. Depp, II.

Respectfully submitted,

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

13. Dated: January 11, 2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of January 2022, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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