

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counterclaim-Defendant,

v.

AMBER LAURA HEARD,

Defendant and Counterclaim-Plaintiff.

FILED  
MOTION DOCKET

2021 OCT 15 PM 1:27

JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

Civil Action No.: CL-2019-0002911

**DEFENDANT AND COUNTERCLAIM-PLAINTIFF AMBER  
LAURA HEARD'S CROSS MOTION TO COMPEL  
MR. DEPP'S PRODUCTION OF FORENSIC EVIDENCE AND FOR SANCTIONS**

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 produce the forensic evidence identified in the accompanying Memorandum, and for sanctions as a result of contempt of a Court Order over a sustained period of time.

**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.

October 15, 2021

Respectfully submitted,



Elaine Charlson Bredehoft (VSB #23766)  
Adam S. Nadelhaft (VSB #91717)  
Clarissa K. Pintado (VSB 86882)  
David E. Murphy (VSB #90938)  
CHARLSON BREDEHOFT COHEN & BROWN, P.C.  
11260 Roger Bacon Drive, Suite 201  
Reston, VA 20190  
(703) 318-6800  
[ebredehoft@cbcblaw.com](mailto:ebredehoft@cbcblaw.com)  
[anadelhaft@cbcblaw.com](mailto:anadelhaft@cbcblaw.com)  
[cpintado@cbcblaw.com](mailto:cpintado@cbcblaw.com)  
[dmurphy@cbcblaw.com](mailto: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  
[broddenborn@woodsrogers.com](mailto:broddenborn@woodsrogers.com)  
[jtreece@woodsrogers.com](mailto:jtreece@woodsrogers.com)

*Counsel to Defendant and Counterclaim-Plaintiff,  
Amber Laura Heard*

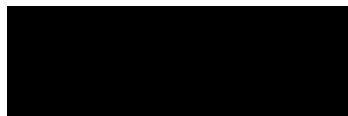
**CERTIFICATE OF SERVICE**

I certify that on this 15<sup>th</sup> day of October, 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](mailto:bchew@brownrudnick.com)  
[acrawford@brownrudnick.com](mailto: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](mailto:cvasquez@brownrudnick.com)

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



Elaine Charlson Bredehoft