VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

2019 SEP 10 10 1: 44

Civil Action No.: CL-2019-0002911

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

CONSENT MOTION TO ADMIT PRO HAC VICE ADAM R. WALDMAN 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 Adam R. Waldman, attorney in good standing with in the District of Columbia and state of Maryland, to serve as associate counsel for the Plaintiff John C. Depp, II in the above titled action. In support of this Motion, undersigned counsel respectfully represents the following:

- 1. Adam R. Waldman is an attorney with The Endeavor Law Firm P.C. ("Endeavor Law Firm") located in Washington, D.C.
- 2. Mr. Waldman works out of the Endeavor Law Firm office with the following address and contact information: 5163 Tilden Street, NW, Washington, DC 20016 - Telephone: (202) 550-4507.
 - 3. Mr. Waldman is an attorney in good standing in the District of Columbia and state of Maryland, admitted to practice before the courts of the District of Columbia and state of Maryland, as detailed further within the respective sworn Application for Admission *Pro Hac* Vice attached hereto as Exhibits 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. Mr. Waldman has not been disciplined by any Bar of any state nor has he been sanctioned by any court.
- 5. Mr. Waldman 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 Adam R. Waldman be permitted to appear in this Court as pro hac vice counsel on behalf of Plaintiff 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.

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

Dated: September 10, 2019

Respectfully submitted,

By:

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Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the <u>10th</u> day of September 2019, I served the foregoing via First Class Mail (postage prepaid) and electronic mail upon the following:

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