

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

FILED  
MOTION  
2021 SEP 24 PM 12:12  
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 JOHN C. DEPP, II'S MOTION TO COMPEL DEFENDANT AMBER LAURA HEARD'S PRODUCTION OF HER ORIGINAL DEVICES AND OPERATING SYSTEM DRIVES AND CLOUD BACKUPS OF THESE ORIGINAL DEVICES AS REQUESTED IN PLAINTIFF'S SEVENTH SET OF REQUESTS FOR PRODUCTION**

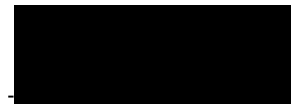
In accordance with Rule 4:12 of the Rules of the Supreme Court of Virginia, Plaintiff John C. Depp, II, by and through his undersigned counsel, hereby moves this Honorable Court for entry of an Order compelling Defendant Amber Laura Heard to produce her original devices, including mobile devices and computers (including laptops and iPads), as well as operating system drives and cloud backups of these original devices for purposes of performing a physical extraction of all relevant data from the original devices, as requested in Plaintiff's Seventh Set of Requests for Production.

In accordance with Rule 4:12(a)(2), counsel for Plaintiff hereby certifies that they have in good faith conferred with opposing counsel in an effort to resolve this dispute without court action.

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

Dated: September 24, 2021

Respectfully submitted,



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