VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

FILED CIVIL PROCESSING

2020 SEP -9 P 1:58

JOHN T. FREY CLERK, CIRCUIT COURT FAICEAX, VA

FAICEAX, VA

Civil Action No.: CL-2019-0002911

JOHN C. DEPP, II

Plaintiff/Counterclaim Defendant,

V.

AMBER LAURA HEARD,

Defendant/Counterclaim Plaintiff.

PRAECIPE

Plaintiff John C. Depp, II, by and through his undersigned counsel, hereby submits the attached letter from Wayne M. Smith, Esq., Senior Vice President, Corporate Legal, of Warner Bros. Entertainment, Inc., dated yesterday, September 8, 2020, to Elaine C. Bredehoft and undersigned counsel, to which he plans to refer to at oral argument on Friday, September 11, 2020, in support of Plaintiff's Motion for Continuance.

The letter, attached hereto as **Exhibit A**, states that the studio requires Mr. Depp to be in London from September 17, 2020 through mid-February 2021 for the production of *Fantastic Beasts* 3, and that production of *Aquaman 2* will not start any earlier than May 31, 2021.

Respectfully submitted,

Benjamin G. Chew (VSB #29113) Andrew C. Crawford (VSV # 89093) BROWN RUDNICK LLP 601 Thirteenth Street NW, Suite 600 Washington, DC 20005

Tel.: (202) 536-1785 Fax: (617) 289-0717

bchew@brownrudnick.com

Camille M. Vasquez (*pro hac vice*) BROWN RUDNICK LLP 2211 Michelson Drive Irvine, CA 92612

Tel.: (949) 752-7100 Fax: (949) 252-1514

cvasquez@brownrudnick.com

Adam R. Waldman (pro hac vice)
THE ENDEAVOR GROUP LAW FIRM, P.C.
5163 Tilden Street, NW
Washington, DC 20016

Tel.: (202) 715-0966 Fax: (202) 715-0964

awaldman@theendeavorgroup.com

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

Dated: September 9, 2021



Wayne M. Smith Senior Vice President Corporate Legal

September 8, 2020

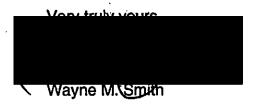
VIA EMAIL

Elaine Charlson Bredehoft Charlson Bredehoft Cohen & Brown 11260 Roger Bacon Dr., Suite 201 Reston, VA 20190 Benjamin G. Chew Brown Rudnick LLP 601 Thirteenth Street NW Suite 600 Washington, DC 20005

Re: Depp v. Heard

Dear Ms. Bredehoft and Mr. Chew:

Thank you both for taking the time to discuss with me the scheduling of various matters in your respective clients' lawsuit. As we have discussed, *Fantastic Beasts 3* began production this month in the United Kingdom, and we require Mr. Depp to be in the United Kingdom from September 17th through the anticipated end of production in mid-February, 2021. As to *Aquaman 2*, that film will not start production any earlier than May 31, 2021.



WMS:wb

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of September 2020, I caused copies of the foregoing Praecipe to be served via email (per written agreement between the Parties) on the following:

J. Benjamin Rottenborn (VSB No. 84796)
Joshua R. Treece (VSB No. 79149)
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
Telephone: (540) 983-7540
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Elaine Charlson Bredehoft (VSB No. 23766) Carla D. Brown (VSB No. 44803)

Adam S. Nadelhaft (VSB No. 91717)

David E. Murphy (VSB No. 90938)

CHARLSON BREDEHOFT COHEN & BROWN, P.C.

11260 Roger Bacon Dr., Suite 201

Reston, VA 20190

Phone: 703-318-6800

Fax: 703-318-6808

ebredehoft@cbcblaw.com

cbrown@cbcblaw.com

anahelhaft@cbcblaw.com

dmurphy@cbcblaw.com

Counsel for Defendant Amber Laura Heard

_ Benjamin G. Chew