

VIRGINIA:

IN THE CIRCUIT COURT FOR FAIRFAX COUNTY

FILED
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John C. Depp, II,

Plaintiff,

v.

Amber Laura Heard,

Defendant.

Case No. CL2019-02911

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

DEFENDANT AMBER LAURA HEARD'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS IN RESPONSE TO DEFENDANT'S FOURTH, FIFTH, SIXTH AND SEVENTH REQUEST FOR PRODUCTION OF DOCUMENTS

COMES NOW Defendant Amber Laura 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 John C. Depp II to produce, on or before September 30, 2020, non-privileged documents in response to: (1) Defendant's Fourth Set of Requests for Production of Documents Nos. 1-2, 3-6 & 14; (2) Defendant's Fifth Set of Requests for Production of Documents Nos. 1, 14-15; (3) Defendant's Sixth Set of Requests for Production of Documents Nos. 1-6, 8-10 & 12; and (4) Defendant's Seventh Set of Requests for Production of Documents Nos. 1, 3 and 5-7. In support of this motion, Defendant states as follows:

1. Counsel for Defendant hereby certifies, pursuant to Rule 4:12(a)(2) and 4:15(b), that they have in good faith conferred with counsel for Plaintiff in an effort to obtain the requested responses without judicial intervention.

2. The grounds for Defendant's Motion are addressed more fully in Defendant's accompanying Memorandum in Support.

WHEREFORE, Defendant respectfully requests that the Court enter an Order compelling Mr. Depp to produce, on or before September 30, 2020, non-privileged documents in response to:

(1) Defendant's Fourth Set of Requests for Production of Documents Nos. 1-2, 3-6 & 14; (2) Defendant's Fifth Set of Requests for Production of Documents Nos. 1, 14-15; (3) Defendant's Sixth Set of Requests for Production of Documents Nos. 1-6, 8-10 & 12; (4) Defendant's Seventh Set of Requests for Production of Documents Nos. 1, 3 & 5-7; and (5) award Ms. Heard her reasonable attorneys' fees and expenses, and grant any additional relief the Court deems just and proper.

Dated this 4th day of September 2020.

Respectfully submitted,

Amber L. Heard



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Counsel to Defendant Amber Laura Heard

CERTIFICATE OF SERVICE

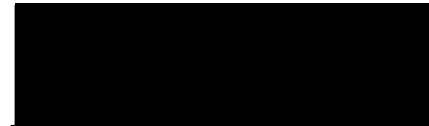
I certify that on this 4th day of September 2020, a copy of the foregoing shall be served by via email, pursuant to the Agreed Order dated August 16, 2019, as follows:

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● ONLY ADMITTED IN MARYLAND

September 4, 2020

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JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

BY MESSENGER

John T. Frey, Clerk
Fairfax County Circuit Court
4110 Chain Bridge Road, 3rd Floor
Fairfax, VA 22030

Re: *Case No. CL-2019-0002911 – John C. Depp, II v. Amber Laura Heard*

Dear Mr. Frey:


Enclosed for filing in the above referenced matter, please find the following:

- Defendant Amber Laura Heard's Motion for Sanctions & Motion in Limine;
- Defendant Amber Laura Heard's Motion to Compel Production of Documents in Response to Defendant's Fourth, Fifth, Sixth, and Seventh Request for Production of Documents;
- Defendant Amber Laura Heard's Opposition to Plaintiff John C. Depp, II's Motion for Continuance

Also enclosed are extra copies of each filing, which we would appreciate being date-stamped and returned to us via the awaiting messenger.

Thank you very much for your assistance.

Very truly yours,



Elaine Charlson Bredhoff