VIRGINIA:

FILED IN THE CIRCUIT COURT OF FAIRFAX COUNTSERVICES

JOHN C. DEPP, II

7819 SEP -5 > 3: 3b

Plaintiff.

CLERK, CIRCUIT COURT

٧.

Civil Action No.: CL-2019-0002911

AMBER LAURA HEARD

Defendant.

MOTION TO ADMIT PRO HAC VICE JOSHUA MATZ AS CO-COUNSEL FOR DEFENDANT

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* Joshua Matz, attorney in good standing with The State Bar of New York, to serve as an associate counsel for the Defendant Amber Laura Heard in the above titled action. In support of this Motion, undersigned counsel respectfully represents the following:

- Joshua Matz is an attorney with the law firm of Kaplan Hecker & Fink LLP
 ("KHF") located in New York, New York.
- 2. Mr. Matz works out of the KHF office with the following address and contact information: 350 Fifth Avenue, Suite 7110, New York, New York 10118 Telephone: (212) 763-0883.
- 3. Mr. Matz is an attorney in good standing in the State of New York, admitted to practice before the state and federal courts in New York as detailed further within the respective sworn Application for Admission *Pro Hac Vice* attached hereto as Exhibit A. The required

application fee has been submitted along with this Motion for the Application as required by

Rule 1A:4 of the Rules of the Supreme Court of Virginia.

4. Mr. Matz has not been disciplined by any Bar of any state nor has he been

sanctioned by any court.

5. Mr. Matz has sought, and received, admission pro hac vice in the courts of the

Commonwealth of Virginia in the last twelve months in one case, and the order granting his

admission pro hac vice is included in his application.

6. The undersigned moves that Joshua Matz be permitted to appear in this Court as

pro hac vice counsel on behalf of Defendant Amber Laura Heard for all purposes permitted

under the Rules of the Supreme Court of Virginia.

7. Undersigned local counsel, J. Benjamin Rottenborn and Joshua R. Treece, 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 Joshua Matz,

pro hac vice, for the limited purpose of appearing and participating in this action as pro hac vice

counsel for Defendant Amber Laura Heard.

Dated: September 5, 2019

Respectfully submitted,

Amber L. Heard

By Counsel

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Roberta A. Kaplan (pro hac vice pending)
Julie E. Fink (pro hac vice pending)
John C. Quinn (pro hac vice pending)
Joshua Matz (pro hac vice pending)
KAPLAN HECKER & FINK LLP
350 Fifth Avenue, Suite 7110
New York, New York 10118
(212) 763-0883
rkaplan@kaplanhecker.com
jfink@kaplanhecker.com
jquinn@kaplanhecker.com
jmatz@kaplanhecker.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
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Eric M. George (admitted pro hac vice)
Richard A. Schwartz (admitted pro hac vice)
BROWNE GEORGE ROSS LLP
2121 Avenue of the Stars, Suite 2800
Los Angeles, California 90067
(310) 274-7100
egeorge@bgrfirm.com
rschwartz@bgrfirm.com

Counsel to Defendant Amber Laura Heard

CERTIFICATE OF SERVICE

I certify that on this 5th day of September, 2019, a copy of the foregoing Motion to Admit *Pro Hac Vice* Joshua Matz as Co-Counsel for Defendant shall be served by first class mail, postage prepaid, and by email, upon:

Benjamin G. Chew, Esq.
Elliot J. Weingarten, 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
eweingarten@brownrudnick.com
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 Adam R. Waldman, Esq.
THE ENDEAVOR LAW FIRM, P.C.
1775 Pennsylvania Avenue, N.W., Suite 350
Washington, DC 20006
awaldman@theendeavorgroup.com

Robert Gilmore, Esq.
Kevin Attridge, Esq.
STEIN MITCHELL BEATO & MISSNER LLP
901 Fifteenth Street, N.W.
Suite 700
Washington, D.C. 20005
Telephone: (202) 601-1589
Facsimile: (202) 296-8312
rgilmore@steinmitchell.com
kattridge@steinmitchell.com

Counsel for Plaintiff John C. Depp, II

8. Benjamin Rottenborn
Joshua Treece
WOODS ROGERS PLC
10 S. Jefferson Street
Suite 1400
Roanoke, VA 24011
Telephone: (540) 983-7540
Facsimile: (540) 983-7711

<u>brottenborn@woodsrogers.com</u> jtreece@woodsrogers.com