

VIRGINIA :

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff and Counter-defendant,

v.

AMBER LAURA HEARD

Defendant and Counter-plaintiff.

Civil Action No.: CL-2019-0002911

ORDER

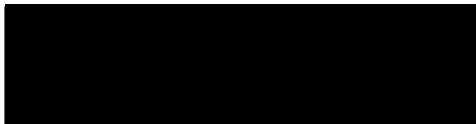
Upon consideration of Defendant's Motion to Compel the Deposition of Adam Waldman ("Defendant's Motion"), and Plaintiff's Motion to Quash or for a Protective Order as to that deposition ("Plaintiff's Motion"), the parties' respective briefs, and being fully advised, it is, this 14th day of January, 2021 hereby ORDERED as follows:

1. Defendant's Motion is DENIED;
2. Plaintiff's Motion to Quash is GRANTED; Plaintiff's Motion for Protective Order is DENIED;
3. Adam R. Waldman was never properly served with a subpoena. Service of a notice of deposition on Plaintiff's counsel for Mr. Waldman's deposition was invalid. Mr. Waldman can be deposed if properly served with a subpoena.
4. Defendant shall reimburse Plaintiff for his reasonable attorneys' fees expended in responding to Defendant's Motion and in preparing Plaintiff's Motion to Quash.
5. Counsel for Plaintiff shall submit a Declaration of fees and costs within seven (7) days; and Defendant may submit any Opposition to the reasonableness of the fees and costs within

No Fees.

seven (7) days thereafter; and the Defendant shall pay to counsel for Plaintiff the amount set by the Court within seven (7) days after receipt of the Court's ruling on reasonableness.

ENTERED this 14th day of January, 2021.



The Honorable Bruce D. White
CHIEF JUDGE

Compliance with Rule 1:13 requiring the endorsement of counsel of record is modified by the Court, in its discretion, to permit the submission of the following electronic signatures of counsel in lieu of an original endorsement or dispensing with endorsement.

WE ASK FOR THIS EXCEPT AS TO THE COURT'S RULING ON PLAINTIFF'S MOTION FOR PROTECTIVE ORDER:



Benjamin G. Chew, Esq. (VSB No. 29113)
Camille M. Vasquez (*pro hac vice*)
BROWN RUDNICK LLP
601 Thirteenth Street, N.W.
Washington, D.C. 20005
Telephone: (202) 536-1700
Facsimile: (202) 536-1701
Email: bchew@brownrudnick.com

Counsel for Plaintiff and Counter-defendant, John C. Depp II

**SEEN AND EXCEPTED TO FOR THE REASONS STATED IN DEFENDANT'S BRIEFS
AND DURING THE HEARING, EXCEPT AS TO THE COURT'S RULING ON
PLAINTIFF'S MOTION FOR PROTECTIVE ORDER:**

 *by [signature]*
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

anadelhaft@cbcblaw.com

dmurphy@cbcblaw.com

Counsel for Defendant and Counter-plaintiff, Amber Laura Heard