

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counterclaim-Defendant,

v.

AMBER LAURA HEARD,

Defendant and Counterclaim-Plaintiff.

Civil Action No.: CL-2019-00000

JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

7/21 DEC 22 PM 1:53

FILED  
MOTIONS DOCKET

**DEFENDANT AND COUNTERCLAIM-PLAINTIFF AMBER LAURA HEARD'S  
MOTION TO COMPEL PLAINTIFF AND COUNTERCLAIM-DEFENDANT JOHN C.  
DEPP, II'S PRODUCTION OF HIS ORIGINAL DEVICES AND OPERATING SYSTEM  
DRIVES AND CLOUD BACKUPS OF THESE ORIGINAL DEVICES AS REQUESTED  
IN DEFENDANT AND COUNTERCLAIM-PLAINTIFF'S 14TH, 15TH AND 16TH  
REQUESTS FOR PRODUCTION OF DOCUMENTS**

COMES NOW Defendant and Counterclaim-Plaintiff Amber Laura Heard ("Ms. 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 and Counterclaim-Defendant John C. Depp II to fully produce his original devices and operating system drives and cloud backups of these original devices as requested in Defendant and Counterclaim-Plaintiff's Fourteenth, Fifteenth, and Sixteenth Requests for Production of Documents.

The grounds for this Motion are set forth in the accompanying Memorandum.

**CERTIFICATE UNDER RULE 4:12(A)(2)**

Pursuant to Va. Sup. Ct. R's 4:1(b)(8) and 4:15(b), Defendant and Counterclaim-Plaintiff, by counsel, certifies that she has conferred with counsel for Plaintiff and Counterclaim-Defendant in an effort to resolve the issues addressed in this Motion prior to placing it on the docket, and has complied with all procedures in the Conciliator Protocol Order.

December 22, 2021

Respectfully submitted,



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*Counsel to Defendant and Counterclaim-Plaintiff,  
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**CERTIFICATE OF SERVICE**

I certify that on this 22<sup>nd</sup> day of December, 2021, a copy of the foregoing was served by email, by agreement of the parties, addressed as follows:

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