

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

FILED
2020 SEP 23 AM 11:47
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

JOHN C. DEPP, II,
Plaintiff and Counter-Defendant,

v.

AMBER LAURA HEARD,
Defendant and Counter-Plaintiff.

Civil Action No.: CL-2019-0002911

DEFENDANT AMBER LAURA HEARD'S MOTION TO COMPEL DEPOSITION OF JOHN C. DEPP II, PRODUCTION OF DOCUMENTS IN RESPONSE TO DEFENDANT'S NINTH REQUEST FOR PRODUCTION OF DOCUMENTS, AND FOR SANCTIONS

Defendant Amber Laura Heard, by counsel, hereby moves this Court for an Order granting appropriate relief and sanctions, to include the dismissal of the Complaint, with prejudice, compelling production of the 9th RFPs, compelling Plaintiff Mr. Depp to appear for three successive days in counsel for Defendant's offices in Virginia on or before October 30, 2020 on dates and times agreeable to counsel for Defendant, and to award fees and costs to Defendant for having to bring this motion.

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, by counsel, certifies that she has conferred with counsel for Plaintiff in an effort to resolve the issues addressed in this Motion prior to placing this on the docket.

September 23, 2020

Respectfully submitted,

Amber L. Heard

By Counsel 

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CERTIFICATE OF SERVICE

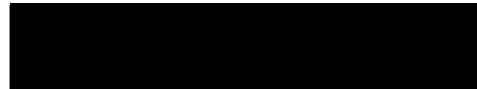
I certify that on this 23rd day of September 2020, a copy of the foregoing was served by email, by agreement of the parties, addressed as follows:

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