

VIRGINIA:

IN THE CIRCUIT COURT FOR FAIRFAX COUNTY

John C. Depp, II,

Plaintiff,

v.

Case No. CL2019-02911

Amber Laura Heard,

Defendant.

**DEFENDANT AMBER LAURA HEARD'S
MOTION TO COMPEL PRODUCTION OF DOCUMENTS
IN RESPONSE TO DEFENDANT'S REVISED EIGHTH
REQUEST FOR PRODUCTION OF DOCUMENTS AND
TAX INFORMATION PURSUANT TO THIS COURT'S OCTOBER 10 ORDER**

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 fully produce non-privileged documents in response to Defendant's Revised Eighth Set of Requests for Production of Documents, and portions of his personal tax returns (as Ordered by the Court on September 18, as reflected in the October 10, 2020 Order) from January 2012 through the present.

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.

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

FILED
CLERK'S DOCKET
2020 OCT 15 AM 10:24
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

Dated this 16th day of October 2020.

Respectfully submitted,

Amber L. Heard



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CERTIFICATE OF SERVICE

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

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