

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

FILED
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2020 OCT 29 PM 2:59
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS AND INTERROGATORY RESPONSES

In accordance with Rule 4:12 of the Rules of the Supreme Court of Virginia, Plaintiff John C. Depp, II, by and through his undersigned counsel, hereby moves this Honorable Court for entry of an Order compelling Defendant Amber Laura Heard to produce documents and respond to interrogatories.

In accordance with Rule 4:12(a)(2), counsel for Plaintiff hereby certifies that they have in good faith conferred with opposing counsel in an effort to resolve this dispute without court action.

A memorandum in support of this motion and proposed Order are filed herewith for the Court's consideration.

Dated: October 29, 2020

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of October 2020, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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