

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX COUNTY, VA  
MAR 11 AM 11:24  
FILED  
MAJORS DOCKET

**PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT  
AS TO DEFENDANT'S ANTI-SLAPP IMMUNITY**

Plaintiff John C. Depp, II, by and through his undersigned counsel, pursuant to rule 3:20 of the Rules of the Supreme Court of Virginia, hereby moves this Honorable Court for summary judgment as to Defendant's anti-SLAPP immunity.

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

Respectfully submitted,

  
Benjamin C. Chew (13)

BROWN RUDNICK LLP  
601 Thirteenth Street NW, Suite 600  
Washington, DC 20005  
Tel.: (202) 536-1785  
Fax: (617) 289-0717  
bchew@brownrudnick.com

Leo J. Presiado (*pro hac vice*)  
Camille M. Vasquez (*pro hac vice*)  
Samuel A. Moniz (*pro hac vice*)  
BROWN RUDNICK LLP  
2211 Michelson Drive  
Irvine, CA 92612

Tel.: (949) 752-7100  
Fax: (949) 252-1514  
cvasquez@brownrudnick.com

*Counsel for Plaintiff and  
Counterclaim Defendant John C. Depp, II*

Dated: March 11, 2022