

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-2019-0002911

**CONSENT ORDER RESPECTING PLAINTIFF'S RESPONSES TO
DEFENDANT'S TENTH REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff and Counterclaim Defendant John C. Depp, II, and Defendant and Counterclaim Plaintiff Amber Laura Heard, by counsel, having engaged in extensive meet and confers respecting Defendant's Tenth Request for Production of Documents, and Plaintiff having consented to an Order respecting certain of these discovery requests, as evidenced by their signatures below, it is hereby:

ORDERED Mr. Depp shall produce to counsel for Ms. Heard all non-privileged documents responsive to the Requests from Defendant and Counterclaim Plaintiff's Tenth Request for Production of Documents, no later than 5:00 P.M. EST on September 3, 2021, as follows:

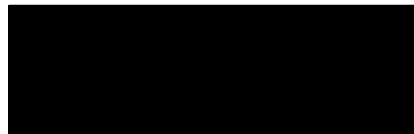
- 1) RFP No. 7 - as modified to delete the words "consulted and/or" and RFP No. 9, both to the extent already in existence, and subject to the right of supplementation;
- 2) RFP No. 11 - to the extent in Plaintiff's possession, custody and control;
- 3) RFP Nos. 13, 16 and 18;

8-9-21 No Enu.

- 4) RFP Nos. 12, 14, 15, 17 and 21 – Plaintiff represents he has already produced documents responsive to these requests, but agrees to produce any additional responsive documents in his custody, control and possession;
- 5) RFP No. 19 - Plaintiff represents he has already produced documents responsive to these requests, but agrees to produce any additional responsive documents in his custody, control and possession

SO ORDERED.

August 6, 2021



The Honorable Penney S. Azcarate
Chief Judge, Fairfax County Circuit Court

Compliance with Rule 1:13 requiring the endorsement of counsel of record is modified by the Court, in its discretion, to permit the submission of the following electronic signatures of counsel in lieu of an original endorsement or dispensing with endorsement.

WE ASK FOR THIS:



Elaine Charlson Bredehoft (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 97717)
Clarissa K. Pintado (VSB No. 86882)
David E. Murphy (VSB No. 90938)
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800
ebredehoft@cbcblaw.com
anadelhaft@cbcblaw.com
cpintado@cbcblaw.com
dmurphy@cbcblaw.com

J. Benjamin Rottenborn (VSB No. 84796)
Joshua R. Treece (VSB No. 79149)
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
Telephone: (540) 983-7540
broddenborn@woodsrogers.com
jtreece@woodsrogers.com

Counsel to Defendant/Counterclaim Plaintiff, Amber Laura Heard

SEEN AND CONSENTED TO:

[Redacted] / by express
[Redacted] permission

Benjamin G. Chew (VSB 29113)
Andrew C. Crawford (VSB 89093)
BROWN RUDNICK LLP
601 Thirteenth Street, N.W.
Washington, D.C. 20005
Telephone: (202) 536-1700
Facsimile: (202) 536-1701
bchew@brownrudnick.com
acrawford@brownrudnick.com

Camille M. Vasquez (admitted *pro hac vice*)
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514
cvasquez@brownrudnick.com

Counsel for Plaintiff/Counterclaim Defendant, John C. Depp, II