

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counter-defendant,

v.

AMBER LAURA HEARD,

Defendant and Counter-plaintiff.

Civil Action No.: CL-2019-0002911

MOVED
2021 APR 13 PM 2:37
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

**DEFENDANT AMBER LAURA HEARD'S MOTION FOR LEAVE TO FILE
AN AMENDED ANSWER & GROUNDS OF DEFENSE AND A
SUPPLEMENTAL PLEA IN BAR, TO SCHEDULE A HEARING ON THE
PLEA IN BAR AND SET A BRIEFING SCHEDULE, AND TO STAY DISCOVERY**

COMES NOW Defendant Amber Laura Heard ("Ms. Heard"), by counsel, pursuant to Rules 1:8 and 1:9 of the Rules of the Supreme Court of Virginia, and moves this court for Leave to File an Amended Answer & Grounds of Defense, a Supplemental Plea in Bar, to Schedule a Hearing on the Supplemental Plea in Bar, set a Briefing Schedule, and to Stay Discovery pending on a ruling on the Supplemental Plea in Bar, as follows:

1. Ms. Heard seeks leave to file her Amended Answer and Grounds of Defense, her Supplemental Plea in Bar, to schedule a hearing on the Supplemental Plea in Bar with a briefing schedule, and to stay discovery pending a resolution of the Supplemental Plea in Bar. The grounds for this Motion are set forth in the accompanying Memorandum in Support.

2. Counsel hereby certifies that pursuant to Rule 4:12(a)(2) of the Rules of the Supreme Court of Virginia, counsel conferred with opposing counsel prior to filing this Motion.

Dated this 13th day of April 2021.

Respectfully submitted,

Amber L. Heard



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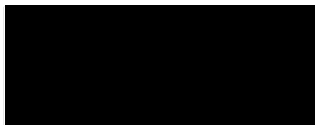
CERTIFICATE OF SERVICE

I certify that on this 13th day of April 2021, a copy of the foregoing was served by email, pursuant to the Agreed Order dated August 16, 2019, as follows:

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