

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

FILED
CIVIL PROCESSING
2022 APR -1 A 11: 02
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

CONSENT MOTION TO ADMIT *PRO HAC VICE*
REBECCA LECAROZ AS CO-COUNSEL FOR PLAINTIFF

Pursuant to Rule 1A:4 of the Rules of the Supreme Court of Virginia, undersigned counsel, who is a member in good standing of the Bar of this Court and the Commonwealth of Virginia, requests that this Court admit *pro hac vice* Rebecca Lecaroz, attorney in good standing within the Commonwealth of Massachusetts, to serve as associate counsel for Plaintiff and Counterclaim Defendant John C. Depp, II in the above titled action. In support of this Motion, undersigned counsel respectfully represents the following:

1. Ms. Lecaroz is an attorney with the law firm Brown Rudnick LLP (“Brown Rudnick”) with a principal office located in Boston, MA.
2. Ms. Lecaroz works out of the Brown Rudnick office with the following address and contact information: One Financial Center, Boston, MA 02111 – Telephone: (617) 856-8200.
3. Ms. Lecaroz is an attorney in good standing in the Commonwealth of Massachusetts, admitted to practice before the courts of the Commonwealth of Massachusetts, as detailed further within the sworn and notarized Application to Appear *Pro Hac Vice* Before a Virginia Tribunal attached hereto as Exhibit A. The required application fee has been submitted

along with this Motion and Application as required by Rule 1A:4 of the Rules of the Supreme Court of Virginia.

4. Ms. Lecaroz has not been disciplined by any Bar of any state nor has she been sanctioned by any court.

5. Ms. Lecaroz has not sought admission *pro hac vice* in the courts of the Commonwealth of Virginia in the last twelve months.


6. The undersigned moves that Rebecca Lecaroz be permitted to associate with local counsel and appear in this Court as *pro hac vice* counsel on behalf of Plaintiff and Counterclaim Defendant John C. Depp, II for all purposes permitted under the Rules of the Supreme Court of Virginia.

7. Undersigned local counsel, Benjamin G. Chew and Andrew C. Crawford, are members in good standing of the Bar of the Commonwealth of Virginia and at least one shall sign all pleadings and personally appear in all proceedings conducted before this Court.

8. Counsel for Defendant and Counterclaim Plaintiff Amber Laura Heard have consented to the application and admission of Ms. Lecaroz.

WHEREFORE, the undersigned moves this Court for an Order admitting Rebecca Lecaroz, *pro hac vice*, for the limited purpose of appearing and participating in this action as *pro hac vice* counsel for Plaintiff and Counterclaim Defendant John C. Depp, II.

Respectfully submitted,

By: 
Benjamin G. Chew (VSB No. 29113)
Andrew C. Crawford (VSB No. 89093)
BROWN RUDNICK LLP

601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Phone: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com
acrawford@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, Seventh Floor
Irvine, CA 92612
Phone: (949) 752-7100
Fax: (949) 252-1514
lpresiado@brownrudnick.com
cvasquez@brownrudnick.com
smoniz@brownrudnick.com

Jessica N. Meyers (*pro hac vice*)
BROWN RUDNICK LLP
7 Times Square
New York, New York 10036
Phone: (212) 209-4938
Fax: (212) 209-4801
jmeyers@brownrudnick.com

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

Dated: April 1, 2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of April 2022, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

J. Benjamin Rottenborn
Joshua R. Treece
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
Telephone: (540) 983-7540
brottenborn@woodsrogers.com
jtreece@woodsrogers.com

Elaine Charlson Bredehoft
Adam S. Nadelhaft
Clarissa K. Pintado
David E. Murphy
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

*Counsel for Defendant and
Counterclaim Plaintiff Amber Laura Heard*


Andrew C. Crawford

Exhibit A

APPLICATION TO APPEAR *PRO HAC VICE* BEFORE A VIRGINIA TRIBUNAL

I, Rebecca MacDowell Lecaroz, the
APPLICANT FIRST NAME MIDDLE NAME LAST NAME SUFFIX

undersigned attorney, hereby apply to this tribunal of the Commonwealth of Virginia,
Fairfax County Circuit Court , to appear as counsel
pro hac vice pursuant to Rule 1A:4 of the Rules of the Supreme Court of Virginia.

I further state the following:

1. The case in which I seek to appear *pro hac vice* is styled

John C. Depp, II v. Amber Laura Heard has

docket number CL-2019-0002911 and is pending in

Fairfax County Circuit Court

This case

is

is not

a related or consolidated matter for which I have previously applied to appear *pro hac vice*.

I have previously applied to appear *pro hac vice* in the following related or consolidated matters:

a. _____
DOCKET NUMBER COURT NAME

DATE OF PRO HAC VICE APPLICATION STYLE OF RELATED OR CONSOLIDATED MATTER

b. _____
DOCKET NUMBER COURT NAME

DATE OF PRO HAC VICE APPLICATION STYLE OF RELATED OR CONSOLIDATED MATTER

Additional Sheet attached.

2. 67 Woodland Road, Bedford, MA 01730
APPLICANT'S RESIDENCE

Brown Rudnick LLP, One Financial Center, Boston, MA 02111
APPLICANT'S OFFICE ADDRESS

FILED
CIVIL PROCESSING
2022 APR - 1 A 11: 02
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

3. Benjamin G. Chew 29113
NAME OF LOCAL COUNSEL VSB NUMBER
Brown Rudnick LLP, 601 Thirteenth Street NW, Suite 600, Washington, DC 20005
STREET ADDRESS
(202) 536-1701 bchew@brownrudnick.com (202) 536-1700
FAX NUMBER EMAIL ADDRESS TELEPHONE NUMBER

4. John C. Depp, II (Plaintiff and Counterclaim Defendant)
NAME OF PARTY TO CASE

Benjamin G. Chew, 601 Thirteenth Street NW, Suite 600, Washington, DC 20005
NAME AND ADDRESS OF COUNSEL FOR PARTY

Amber Laura Heard (Defendant and Counterclaim Plaintiff)
NAME OF PARTY TO CASE

Elanie Charlson Bredehoff, 11260 Roger Bacon Dr., Suite 201, Reston, VA 20190M
NAME AND ADDRESS OF COUNSEL FOR PARTY

NAME OF PARTY TO CASE

NAME AND ADDRESS OF COUNSEL FOR PARTY

Additional sheet attached.

5. Massachusetts 11/30/06 666860
COURT TO WHICH APPLICANT IS ADMITTED DATE OF ADMISSION BAR #

COURT TO WHICH APPLICANT IS ADMITTED DATE OF ADMISSION BAR #

Additional sheet attached.

6. I am a member in good standing and authorized to appear in the courts identified in paragraph 5.

7. I am not currently disbarred or suspended in any state, territory, United States possession or tribunal.

8. I am not subject to a pending disciplinary investigation or proceeding by
 am subject to a pending disciplinary investigation or proceeding by
any court, agency or organization authorized to discipline me as a lawyer. (If such an
investigation or proceeding is pending, attach to this application and incorporate by
reference a statement specifying the jurisdiction, the nature of the matter under
investigation or being prosecuted, and the name and address of the disciplinary
authority investigating or prosecuting the matter.)

9. Within the past three (3) years, I

have not been disciplined

have been disciplined

by any court, agency or organization authorized to discipline me as a lawyer. (If so,
attach to this application and incorporate by reference a statement specifying the
name of the court, agency or organization imposing discipline, the date(s) of such
discipline, the nature of the complaint or charge on which discipline was imposed,
and the sanction.)

10. Within the last twelve (12) months preceding this application, I

have not sought admission *pro hac vice* under this rule.

have sought admission *pro hac vice* under this rule. (If so, attach to this
application and incorporate by reference a copy of the order of the tribunal
granting or denying your previous application. Such order(s) must include the
name of the tribunal, the style of case and the docket number for the case(s) in
which you filed an application and whether the application was granted
or denied.)

Order(s) attached and incorporated by reference.

11. I hereby consent to the jurisdiction of the courts and agencies of the Commonwealth
of Virginia and of the Virginia State Bar and I further consent to service of process at
any address(es) required by this Rule.

12. I agree to review and comply with appropriate rules of procedure as required in the case for which I am applying to appear pro hac vice.

13. I understand and I agree to comply with the rules and standards of professional conduct required of members of the Virginia State Bar.

March 28, 2022

DATE

SIGNATURE OF APPLICANT

Commonwealth/State of Massachusetts

[] City [] County of Plymouth

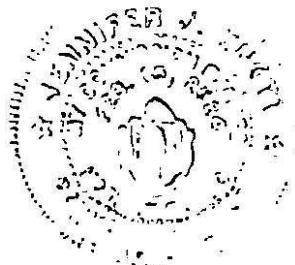
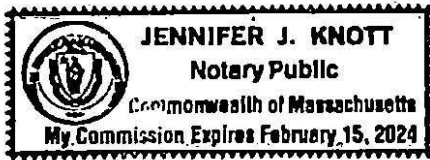
Subscribed and sworn to/affirmed before me on this date by the above-named person.

March 28, 2022

DATE

NOTARY PUBLIC

My commission expires: February 15, 2024



5. Additional Courts Admitted to:

Federal Courts	Date Admitted	Reg. Number
United States Court of Appeals for the First Circuit	04/23/2020	1149039
United States Court of Appeals for the Second Circuit	01/30/2018	(not assigned)
United States Court of Appeals for the Fourth Circuit	01/31/2017	1149039
United States Court of Appeals for the Ninth Circuit	10/13/2021	(not assigned)
United States Court of Appeals for the Federal Circuit	04/06/2010	(not assigned)
United States District Court for the District of Massachusetts	03/22/2007	666860
United States District Court for the District of Colorado	03/04/2021	(not assigned)
United States District Court for the Eastern District of Texas	02/18/2019	
United States District Court for the Western District of Texas	01/12/2021	666860
Supreme Court of the United States	02/26/2018	304852