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2019 AUG 13 10 33  
JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

Civil Action No.: CL-2019-0002911

AMBER LAURA HEARD

Defendant.

**MOTION FOR ENTRY OF PROTECTIVE ORDER**

COMES NOW Defendant Amber Laura Heard (“Defendant”), by counsel, and moves this Honorable Court for entry of a protective order and in support thereof states as follows:

1. This matter revolves around allegations of defamation and underlying facts involving domestic abuse and violence.
2. The Plaintiff and Defendant (collectively “Parties”) are both actors in major motion pictures, garnering a significant amount of public attention, which in turn leads to efforts to obtain personal information, including contact information, as to both Parties.
3. The need for a protective order in this case is undeniable and clearly appropriate. *See, e.g., Perreault v. The Free Lance-Star*, 276 Va. 375, 389–390 (2008).
4. Moreover, entry of a protective order will: (a) expedite the flow of discovery materials; (b) facilitate the prompt resolution of disputes over confidentiality of discovery materials; (c) adequately protect information the Parties are entitled to keep confidential which should not be generally available to the public; (d) ensure that only materials the Parties are entitled to keep confidential are subject to such treatment; and (e) ensure that the Parties are permitted reasonable necessary uses of such materials in preparation for and in the conduct of these proceedings.

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5. The Parties, by counsel, have conferred and they are currently working towards a Stipulated Protective Order and if agreement can be reached counsel will submit the Stipulated Protective Order to this Court for consideration/entry.

6. In the meantime, Defendant intends to submit certain discovery responses stating the need for a protective order and withholding documents until such time as this Motion is resolved and the documents to be produced will fall under the protections of a protective order.

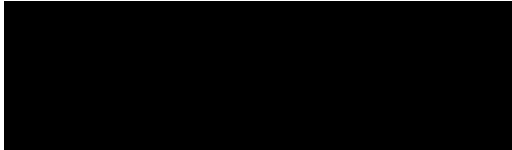
7. To the extent agreement cannot be reached on a Stipulated Protective Order, counsel will file the necessary memorandum, along with competing versions of any Proposed Protective Order, and set this Motion for a hearing as soon as agreement does not appear possible.

WHEREFORE, Defendant Amber Laura Heard respectfully requests that this Honorable Court grant Defendant's Motion for Entry of Protective Order by way of entry of either a Stipulated Protective Order to be submitted by all counsel or a Proposed Protective Order to be submitted by the undersigned and award such other and further relief as this Court deems appropriate.

DATE: August 13, 2019

Respectfully submitted,

AMBER LAURA HEARD  
By Counsel

  
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*Counsel for Defendant Amber Laura Heard*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via United States first class mail and electronic mail this 13<sup>th</sup> day of August 2019, on all counsel of record at:

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*Counsel for Plaintiff John C. Depp, II*

  
Sean Patrick Roche, Esq.

August 13, 2019

**VIA HAND DELIVERY**

Clerk of Court  
Fairfax County Circuit Court  
4110 Chain Bridge Road  
Fairfax, Virginia 22030

**Re: John C. Depp, II v. Amber Laura Heard  
Circuit Court of Fairfax County, Virginia  
Civil Action No. CL-2019-0002911  
Specially Assigned to: Chief Judge Bruce D. White**

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2019 AUG 13 10 33  
JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

Dear Clerk:

Enclosed for filing please find an original and one (1) copy of a Motion for Entry of Protective Order to be filed in the above-referenced matter.

Please return the file stamped copy to me via the waiting courier.

Thank you in advance for your assistance and please do not hesitate to contact me with any questions or if I can be of any help.

Very truly yours,



Sean Patrick Roche

Enclosures (as stated):