

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

FILED  
COURT SERVICES

2021 FEB -3 3:14

JOHN T. FREY

Civil Action No.: CL-2019-000291  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

**CONSENT MOTION TO ADMIT *PRO HAC VICE***  
**LEO J. PRESIADO 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* Leo J. Presiado, attorney in good standing within the state of California, to serve as associate counsel for Plaintiff John C. Depp, II in the above titled action. In support of this Motion, undersigned counsel respectfully represents the following:

1. Leo J. Presiado is an attorney with the law firm Brown Rudnick LLP (“Brown Rudnick”) with a principal office located in Boston, MA and satellite offices located in various locations, including Orange County, California.
2. Mr. Presiado works out of the Brown Rudnick office with the following address and contact information: 2211 Michelson Drive, Seventh Floor, Irvine, CA 92612 – Telephone: (949) 752-7100.
3. Mr. Presiado is an attorney in good standing in the state of California, admitted to practice before the courts of the state of California, 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. Mr. Presiado has not been disciplined by any Bar of any state nor has he been sanctioned by any court.

5. Mr. Presiado 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 Leo J. Presiado be permitted to associate with local counsel and appear in this Court as *pro hac vice* counsel on behalf of Plaintiff John C. Depp, II for all purposes permitted under the Rules of the Supreme Court of Virginia.

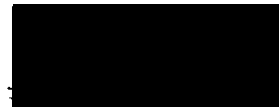
7. Undersigned local counsel, Benjamin G. Chew and Andrew C. Crawford, are members in good standing of the Bar of the Commonwealth of Virginia and at least one shall sign all pleadings and personally appear in all proceedings conducted before this Court.

8. Counsel for Defendant Amber Laura Heard have consented to the application and admission of Mr. Presiado.

WHEREFORE, the undersigned moves this Court for an Order admitting Leo J. Presiado, *pro hac vice*, for the limited purpose of appearing and participating in this action as *pro hac vice* counsel for Plaintiff 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, N.W.  
Washington, D.C. 20005

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Camille M. Vasquez (*pro hac vice*)  
BROWN RUDNICK LLP  
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cvasquez@brownrudnick.com

*Counsel for Plaintiff John C. Depp, II*

Dated: February 3, 2021

FILED  
COURT SERVICES

CERTIFICATE OF SERVICE

941 [REDACTED] 2021 FEB -9 10 1:24

I HEREBY CERTIFY that on this ~~5th~~ day of February 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

Elaine Charlson Bredehoft (VSB No. 23766)  
Carla D. Brown (VSB No. 44803)  
Adam S. Nadelhaft (VSB No. 91717)  
David E. Murphy (VSB No. 90938)  
CHARLSON BREDEHOFT COHEN & BROWN, P.C.  
11260 Roger Bacon Dr., Suite 201  
Reston, VA 20190  
Phone: 703-318-6800  
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ebredehoft@cbcblaw.com  
cbrown@cbcblaw.com  
anadelhaft@cbcblaw.com  
dmurphy@cbcblaw.com

A. 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  
brottenborn@woodsrogers.com  
jtreece@woodsrogers.com

*Counsel for Defendant Amber Laura Heard*

[REDACTED]  
Benjamin G. Chew

# Exhibit A



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)  
 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)  
 NAME OF PARTY TO CASE  
Elaine Charlson Bredehoft, 11260 Roger Bacon Dr., Suite 201, Reston, VA 20190  
 NAME AND ADDRESS OF COUNSEL FOR PARTY  
 \_\_\_\_\_  
 NAME OF PARTY TO CASE  
 \_\_\_\_\_  
 NAME AND ADDRESS OF COUNSEL FOR PARTY

Additional sheet attached.

5. California 12/06/93 166721  
 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

..... 1/28/21 .....  
DATE [REDACTED] APPLICANT

~~Commonwealth~~/State of California

[ ] City [X] County of Orange

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

..... 1/28/21 ..... [REDACTED]

DATE

Teresa Langford  
NOTARY PUBLIC

My commission expires: 3/14/2024

