

**VIRGINIA:**

**IN THE CIRCUIT COURT FOR FAIRFAX COUNTY**

John C. Depp, II,

Plaintiff,

v.

Amber Laura Heard,

Defendant.

Case No. CL2019-02911

FILED  
COURT SERVICES  
2019 SEP 12 A 11:25  
JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

**DEFENDANT AMBER LAURA HEARD'S MOTION TO COMPEL  
PLAINTIFF JOHN C. DEPP II TO PRODUCE DOCUMENTS**

COMES NOW Defendant Amber Laura Heard, by counsel, in accordance with Rule 4:12 of the Rules of the Supreme Court of Virginia, and moves this Court for entry of an order compelling Plaintiff John C. Depp II to produce documents in response to Defendant's pending discovery requests. In support of this motion, Defendant states as follows:

1. Counsel for Defendant hereby certifies, pursuant to Rule 4:12(a)(2), that they have in good faith conferred with counsel for Plaintiff in an effort to obtain the requested documents without judicial intervention.

2. Plaintiff has refused to produce any documents in response to certain of Defendant's requests for production (together the "Requests") of: (1) documents and communications between Plaintiff and any persons employed by him or working on his behalf pertaining to the use of narcotics by Plaintiff or Defendant from 2013 to present (Request No. 4); (2) documents and communications pertaining to any treatment for alcohol or drug use or abuse by Plaintiff or Defendant from 2013 to present (Request No. 5); (3) documents and communications between Plaintiff and any persons employed by him or working on his behalf and Dr. David Kipper that mention Defendant or any of Plaintiff's other romantic partners from

2010 to present (Request No. 38); and (4) documents sufficient to show each time Plaintiff was arrested and the reason(s) for the arrest (Request No. 41).

3. Defendant requests entry of an order compelling Plaintiff to produce nonprivileged documents responsive to the Requests, subject to a schedule to be agreed between the parties after the Court has decided Plaintiff's Motion for a Protective Order.

4. The grounds for Defendant's Motion are stated more fully in Defendant's accompanying Memorandum in Support and incorporated herein by reference.


WHEREFORE, Defendant respectfully requests that the Court enter an order compelling Plaintiff to produce documents responsive to Defendant's Requests, award Defendant her attorney's fees and expenses, and grant such other and further relief as the Court deems just and proper.

Dated this 12th day of September 2019

Respectfully submitted,

Amber L. Heard

By Counsel

  
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## CERTIFICATE OF SERVICE

I certify that on this 12th day of September 2019, a copy of the foregoing shall be served by first class mail, postage prepaid, and by email, upon:

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