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FILED

DEC 30 2020

JOHN T. FREY
Clerk of the Circuit Court
of Fairfax County, VA

December 22, 2020

Chambers of the Honorable Bruce D. White
CHIEF JUDGE
Circuit Court of Fairfax County
4110 Chain Bridge Road
Fairfax, VA 22030

RE: Depp v. Heard, Case No. CL-2019-2911:
Plaintiff's Proposed Order on His Motion to Compel

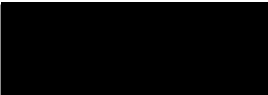
Dear Chief Judge White:

Attached for the Court's consideration is Plaintiff's proposed Order as to the Court's ruling on Mr. Depp's motion to compel, argued before Your Honor on Friday, December 18. In the hopes of jointly submitting a proposed Order on Monday, December 21, as promised, Tr. at p. 30 (**Exhibit A**), Plaintiff sent Ms. Heard's counsel his draft on Sunday evening, December 20. Mr. Rottenborn proposed some changes yesterday, most of which Plaintiff agreed to incorporate. When pressed to finalize the process today, Mr. Rottenborn declined, stating that he needed to check further with his co-counsel who was in arbitration, and that there was no hurry. *See Exhibit B.* (Ms. Bredehoft has continued to communicate with us on issues in the case not relating to this proposed Order.)

In light of our representation to the Court about timely submitting a proposed Order, Plaintiff hereby unilaterally submits for the Court's consideration a proposed Order which we believe faithfully captures the Court's ruling. *See Exhibit A*, Tr. at pp. 8-11, 25-31.

Warm regards,

BROWN RUDNICK LLP


Benjamin G. Chew
VSB # 29113

cc: J. Benjamin Rottenborn, Esq.
Elaine Bredehoft, Esq.
Counsel of Record