

FILED
CLERK'S DOCKET
2020 SEP 14 PM 3:26
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

John C. Depp, II,)
)
 Plaintiff,)
)
 v.)
)
 Amber Laura Heard,)
)
 Defendant.)
)
 _____)

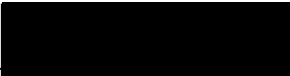
Civil Action No.: CL-2019-0002911

**PLAINTIFF'S MOTION TO SUSTAIN DEMURRER,
PLEA IN BAR TO ALL COUNTERCLAIMS**

Plaintiff John C. Depp, II ("Mr. Depp"), by and through his undersigned counsel, hereby moves this Honorable Court to sustain his demurrer as to all of the Counterclaims filed by Defendant Amber Laura Heard on August 10, 2020 and grant his plea in bar as to five of the statements in Count Two of same ("Plaintiff's Motion").

Mr. Depp filed his demurrer and plea in bar in response to the Counterclaims on August 31, 2020. Pursuant to the Order of the Honorable Bruce D. White, Chief Judge, entered at Calendar Control on September 14, 2020, Mr. Depp hereby submits his oversize brief in support of Plaintiff's Motion, on which the Court will hear oral argument on Friday, October 16, 2020, at 2:00 p.m.

Respectfully submitted,


Benjamin G. Chew (VSB #29113)
Andrew C. Crawford (VSB # 89093)
BROWN RUDNICK LLP
601 Thirteenth Street NW, Suite 600
Washington, DC 20005

Tel.: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com
acrawford@brownrudnick.com

Camille M. Vasquez (*pro hac vice*)
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Tel.: (949) 752-7100
Fax: (949) 252-1514
cvasquez@brownrudnick.com

Adam R. Waldman (*pro hac vice*)
THE ENDEAVOR GROUP LAW FIRM, P.C.
5163 Tilden Street, NW
Washington, DC 20016
Tel.: (202) 715-0966
Fax: (202) 715-0964
awaldman@theendevorgroup.com

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

Dated: September 14, 2020