

VIRGINIA:

IN THE CIRCUIT COURT FOR FAIRFAX COUNTY

John C. Depp, II,

Plaintiff,

v.

Amber Laura Heard,

Defendant.

Case No. CL2019-02911

FILED  
2020 SEP 24 PM 2:06  
JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

**DEFENDANT AMBER LAURA HEARD'S MOTION FOR  
SANCTIONS AGAINST ADAM WALDMAN, COUNSEL FOR PLAINTIFF**

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 revoking the *pro hac vice* admission of Plaintiff's counsel Adam Waldman, issuing a Protective Order preventing him from communicating with the press, members of social media, or potential third party witnesses about this case, and awarding Defendant attorney's fees and costs of bringing this motion. In support of this motion, Defendant states as follows:

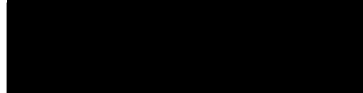
1. Counsel for Defendant hereby certifies, pursuant to Rule 4:12(a)(2) and 4:15(b), that they have in good faith conferred with counsel for Plaintiff in an effort to obtain the requested responses without judicial intervention.

2. The grounds for Defendant's Motion are addressed more fully in Defendant's accompanying Memorandum in Support, which is incorporated herein by reference.

Dated this 24th day of September 2020.

Respectfully submitted,

Amber L. Heard



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*Counsel to Defendant Amber Laura Heard*

## CERTIFICATE OF SERVICE

I certify that on this 24<sup>th</sup> day of September 2020, a copy of the foregoing was served by via email, pursuant to the Agreed Order dated August 16, 2019, as follows:

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