

VIRGINIA:

NO. [REDACTED] ED DOCKET

IN THE CIRCUIT COURT OF FAIRFAX COUNTY 2020 AUG 7 PM 2:27

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

Civil Action No.: CL-2019-0002911

**MOTION TO COMPEL REPSONSES TO DEFENDANT'S
FOURTH AND FIFTH REQUESTS FOR PRODUCTION OF DOCUMENTS**

COMES NOW the Defendant, Amber Laura Heard, by counsel, and moves this Court, pursuant to Va. Sup Ct. R. 4:12(a)(2), for an Order compelling Plaintiff John C. Depp, II to provide full and complete responses to Defendant's Fourth and Fifth Requests for Production of Documents.

The grounds for this Motion are set forth in the attached Memorandum.

August 7, 2020

Respectfully submitted,

[REDACTED]
Elaine Charlson Bredehoft (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, Virginia 20190
Telephone: (703) 318-6800
ebredehoft@cbcblaw.com
anadelhaft@cbcblaw.com
dmurphy@cbcblaw.com

J. 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 to Defendant Amber Laura Heard

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 7th day of August 2020, by email, by agreement of the parties, addressed as follows:

Benjamin G. Chew, Esq.
Andrew C. Crawford, Esq.
BROWN RUDNICK LLP
601 Thirteenth Street, N.W.
Washington, D.C. 20005
Telephone: (202) 536-1700
Facsimile: (202) 536-1701
bchew@brownrudnick.com
acrawford@brownrudnick.com

Adam R. Waldman, Esq.
THE ENDEAVOR LAW FIRM, P.C.
1775 Pennsylvania Avenue, N.W., Suite 350
Washington, DC 20006
awaldman@theendeavorgroup.com

Counsel for Plaintiff John C. Depp, II

Camille M. Vasquez, Esq.
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Telephone: (949) 752-7100
Facsimile: (949) 252-1514
cvasquez@brownrudnick.com


Elaine Charlson Bredehoft (VSB No. 23766)