

VIRGINIA:

FILED
CIVIL PROCESSING
IN THE CIRCUIT COURT OF FAIRFAX COUNTY
2021 FEB -5 P 3:05

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA.

Civil Action No.: CL-2019-0002911

CONSENT MOTION TO ADMIT *PRO HAC VICE*
JESSICA N. MEYERS AS CO-COUNSEL FOR PLAINTIFF

Pursuant to Rule 1A:4 of the Rules of the Supreme Court of Virginia, undersigned counsel, who is a member in good standing of the Bar of this Court and the Commonwealth of Virginia, requests that this Court admit *pro hac vice* Jessica N. Meyers, attorney in good standing within the state of New York and Commonwealth of Massachusetts, to serve as associate counsel for Plaintiff John C. Depp, II in the above titled action. In support of this Motion, undersigned counsel respectfully represents the following:

1. Jessica N. Meyers is an attorney with the law firm Brown Rudnick LLP (“Brown Rudnick”) with a principal office located in Boston, MA and satellite offices located in various locations, including New York, NY.
2. Ms. Meyers works out of the Brown Rudnick office with the following address and contact information: 7 Times Square, New York, NY 10036 – Telephone: (212) 209-4800.
3. Ms. Meyers is an attorney in good standing in the state of New York and Commonwealth of Massachusetts, and admitted to practice before the courts of the state of New York and Commonwealth of Massachusetts, as detailed further within the sworn and notarized Application to Appear *Pro Hac Vice* Before a Virginia Tribunal attached hereto as Exhibit A.

The required application fee has been submitted along with this Motion and Application as required by Rule 1A:4 of the Rules of the Supreme Court of Virginia.

4. Ms. Meyers has not been disciplined by any Bar of any state nor has she been sanctioned by any court.

5. Ms. Meyers has sought admission *pro hac vice* in the courts of the Commonwealth of Virginia in the last twelve months. The order of the tribunal granting Ms. Meyers' previous application is attached hereto as part of Exhibit A.

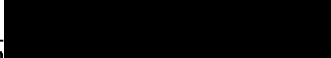
6. The undersigned moves that Jessica N. Meyers be permitted to associate with local counsel and appear in this Court as *pro hac vice* counsel on behalf of Plaintiff John C. Depp, II for all purposes permitted under the Rules of the Supreme Court of Virginia.

7. Undersigned local counsel, Benjamin G. Chew and Andrew C. Crawford, are members in good standing of the Bar of the Commonwealth of Virginia and at least one shall sign all pleadings and personally appear in all proceedings conducted before this Court.

8. Counsel for Defendant Amber Laura Heard have consented to the application and admission of Ms. Meyers.

WHEREFORE, the undersigned moves this Court for an Order admitting Jessica N. Meyers, *pro hac vice*, for the limited purpose of appearing and participating in this action as *pro hac vice* counsel for Plaintiff John C. Depp, II.

Respectfully submitted,

By: 
Benjamin G. Chew (VSB No. 29113)
Andrew C. Crawford (VSB No. 89093)
BROWN RUDNICK LLP

601 Thirteenth Street, N.W.
Washington, D.C. 20005
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Camille M. Vasquez (*pro hac vice*)
BROWN RUDNICK LLP
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cvasquez@brownrudnick.com

Counsel for Plaintiff John C. Depp, II

Dated: February 5, 2021

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of February 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

Elaine Charlson Bredehoft (VSB No. 23766)
Carla D. Brown (VSB No. 44803)
Adam S. Nadelhaft (VSB No. 91717)
David E. Murphy (VSB No. 90938)
CHARLSON BREDEHOFT COHEN & BROWN, P.C.
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A. Benjamin Rottenborn (VSB No. 84796)
Joshua R. Treece (VSB No. 79149)
WOODS ROGERS PLC
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Counsel for Defendant Amber Laura Heard

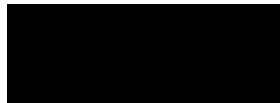

Benjamin G. Chew

Exhibit A

APPLICATION TO APPEAR *PRO HAC VICE* BEFORE A VIRGINIA TRIBUNAL

I, Jessica Nicole Meyers _____, the
APPLICANT FIRST NAME MIDDLE NAME LAST NAME SUFFIX

undersigned attorney, hereby apply to this tribunal of the Commonwealth of Virginia,
Fairfax County Circuit Court _____, to appear as counsel
pro hac vice pursuant to Rule 1A:4 of the Rules of the Supreme Court of Virginia.

I further state the following:

1. The case in which I seek to appear *pro hac vice* is styled

John C. Depp, II v. Amber Laura Heard _____, has
docket number CL-2019-0002911 and is pending in
Fairfax County Circuit Court _____.

This case

- is
 is not

a related or consolidated matter for which I have previously applied to appear *pro hac vice*.

- I have previously applied to appear *pro hac vice* in the following related or
consolidated matters:

- a. _____
DOCKET NUMBER COURT NAME

DATE OF PRO HAC VICE APPLICATION STYLE OF RELATED OR CONSOLIDATED MATTER

- b. _____
DOCKET NUMBER COURT NAME

DATE OF PRO HAC VICE APPLICATION STYLE OF RELATED OR CONSOLIDATED MATTER

- Additional Sheet attached.

2. Leeds, NY

APPLICANT'S RESIDENCE

Brown Rudnick, LLP, 7 Times Square New York, NY 10036

APPLICANT'S OFFICE ADDRESS

3. Benjamin G. Chew 29113
NAME OF LOCAL COUNSEL VSB NUMBER
c/o Brown Rudnick LLP, 601 Thirteenth Street, NW Washington, DC 20005
STREET ADDRESS
(202) 536-1701 bchew@brownrudnick.com (202) 536-1700
FAX NUMBER EMAIL ADDRESS TELEPHONE NUMBER

4. John C. Depp, II (Plaintiff)
NAME OF PARTY TO CASE

NAME AND ADDRESS OF COUNSEL FOR PARTY

NAME OF PARTY TO CASE

NAME AND ADDRESS OF COUNSEL FOR PARTY

NAME OF PARTY TO CASE

NAME AND ADDRESS OF COUNSEL FOR PARTY

Additional sheet attached.

5. <u>New York</u>	<u>07/27/17</u>	<u>5524442</u>
COURT TO WHICH APPLICANT IS ADMITTED	DATE OF ADMISSION	BAR #
<u>Massachusetts</u>	<u>11/20/15</u>	<u>694460</u>
COURT TO WHICH APPLICANT IS ADMITTED	DATE OF ADMISSION	BAR #

Additional sheet attached.

6. I am a member in good standing and authorized to appear in the courts identified in paragraph 5.

7. I am not currently disbarred or suspended in any state, territory, United States possession or tribunal.

8. I am **not** subject to a pending disciplinary investigation or proceeding by
 am subject to a pending disciplinary investigation or proceeding by
any court, agency or organization authorized to discipline me as a lawyer. (If such an
investigation or proceeding is pending, attach to this application and incorporate by
reference a statement specifying the jurisdiction, the nature of the matter under
investigation or being prosecuted, and the name and address of the disciplinary
authority investigating or prosecuting the matter.)

9. Within the past three (3) years, I

have **not** been disciplined

have been disciplined

by any court, agency or organization authorized to discipline me as a lawyer. (If so,
attach to this application and incorporate by reference a statement specifying the
name of the court, agency or organization imposing discipline, the date(s) of such
discipline, the nature of the complaint or charge on which discipline was imposed,
and the sanction.)

10. Within the last twelve (12) months preceding this application, I

have **not** sought admission *pro hac vice* under this rule.

have sought admission *pro hac vice* under this rule. (If so, attach to this
application and incorporate by reference a copy of the order of the tribunal
granting or denying your previous application. Such order(s) must include the
name of the tribunal, the style of case and the docket number for the case(s) in
which you filed an application and whether the application was granted
or denied.)

Order(s) attached and incorporated by reference.

11. I hereby consent to the jurisdiction of the courts and agencies of the Commonwealth
of Virginia and of the Virginia State Bar and I further consent to service of process at
any address(es) required by this Rule.

12. I agree to review and comply with appropriate rules of procedure as required in the case for which I am applying to appear pro hac vice.

13. I understand and I agree to comply with the rules and standards of professional conduct required of members of the Virginia State Bar.

..... 1/28/21

DATE

..... [REDACTED]

SIGNATURE OF APPLICANT

Commonwealth/State of New York

[] City [] County of Hudson, Columbia County

Subscribed and sworn to/affirmed before me on this date by the above-named person.

..... 1/28/21

DATE

..... [REDACTED]

NOTARY PUBLIC

My commission expires: 11/16/24

DANIELLE PALMATEER
Notary Public, State of New York
Qualified in Greene County
Reg. No. 01PA6411311
My Commission Expires 11/16/2024

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF LYNCHBURG

LIBERTY UNIVERSITY, INC.,)
)
Plaintiff,)
)
 v.)
)
 THE NEW YORK TIMES COMPANY,)
 d/b/a The New York Times, a New York)
 Corporation, *et al.*,)
)
Defendants.)

Case No.: CL20-657


ORDER

This day came Andrew M. Bowman, Esq.—a member in good standing of the Virginia State Bar and local counsel for Plaintiff Liberty University, Inc.—and presented to the Court a Motion for Admission of Jessica N. Meyers, Esq. to Appear *Pro Hac Vice* as Counsel for Plaintiff (the “Motion”), pursuant to Rule 1A:4 of the Rules of the Supreme Court of Virginia.

Upon consideration of the Motion and it appearing just and proper to do so, it is hereby ORDERED that the Motion is GRANTED. In association with local counsel, and together with the Virginia State Bar members in good standing from Gentry Locke serving as Plaintiff’s counsel of record, Ms. Meyers is hereby admitted to appear as counsel *pro hac vice* for Plaintiff in the above referenced proceeding.

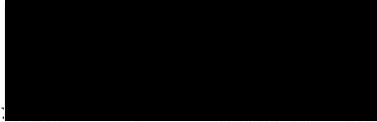
Pursuant to Rule 1:13 of the Rules of the Supreme Court of Virginia, the Court hereby dispenses with endorsement of Defendants on this Order.

ENTER this 15th day of September, 2020.



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WE ASK FOR THIS:



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Andrew M. Bowman (VSB No. 86754)
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bowman@gentrylocke.com

Michael Bowe (*pro hac vice* pending)
Lauren Tabaksblat (*pro hac vice* forthcoming)
Jessica N. Meyers (*pro hac vice* forthcoming)
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ltabaksblat@brownrudnick.com
jmeyers@brownrudnick.com

Counsel for Plaintiff

cc: *Allys*
J/L



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