

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counterclaim-Defendant,

v.

AMBER LAURA HEARD,

Defendant and Counterclaim-Plaintiff.

Civil Action No.: CL-2019-00000

FILED
MOTIONS DOCKET
2021 DEC 22 PM 1:53
JOHN C. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

**DEFENDANT AND COUNTERCLAIM-PLAINTIFF AMBER LAURA HEARD'S
MOTION TO COMPEL PLAINTIFF AND COUNTERCLAIM-DEFENDANT JOHN C.
DEPP, II'S PRODUCTION OF HIS ORIGINAL DEVICES AND OPERATING SYSTEM
DRIVES AND CLOUD BACKUPS OF THESE ORIGINAL DEVICES AS REQUESTED
IN DEFENDANT AND COUNTERCLAIM-PLAINTIFF'S 14TH, 15TH AND 16TH
REQUESTS FOR PRODUCTION OF DOCUMENTS**

COMES NOW Defendant and Counterclaim-Plaintiff Amber Laura Heard ("Ms. 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 compelling Plaintiff and Counterclaim-Defendant John C. Depp II to fully produce his original devices and operating system drives and cloud backups of these original devices as requested in Defendant and Counterclaim-Plaintiff's Fourteenth, Fifteenth, and Sixteenth Requests for Production of Documents.

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

CERTIFICATE UNDER RULE 4:12(A)(2)

Pursuant to Va. Sup. Ct. R's 4:1(b)(8) and 4:15(b), Defendant and Counterclaim-Plaintiff, by counsel, certifies that she has conferred with counsel for Plaintiff and Counterclaim-Defendant in an effort to resolve the issues addressed in this Motion prior to placing it on the docket, and has complied with all procedures in the Conciliator Protocol Order.

December 22, 2021

Respectfully submitted,



Elaine Charlson Bredehoft (VSB #23766)
Adam S. Nadelhaft (VSB #91717)
Clarissa K. Pintado (VSB 86882)
David E. Murphy (VSB #90938)
CHARLSON BREDEHOFT COHEN & BROWN, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, VA 20190
(703) 318-6800
ebredehoft@cbcblaw.com
anadelhaft@cbcblaw.com
cpintado@cbcblaw.com
dmurphy@cbcblaw.com

J. Benjamin Rottenborn (VSB #84796)
Joshua R. Treece (VSB #79149)
WOODS ROGERS PLC
10 S. Jefferson Street, Suite 1400
P.O. Box 14125
Roanoke, Virginia 24011
(540) 983-7540
brotenborn@woodsrogers.com
jtreece@woodsrogers.com

*Counsel to Defendant and Counterclaim-Plaintiff,
Amber Laura Heard*

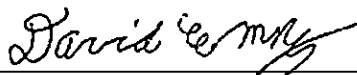
CERTIFICATE OF SERVICE

I certify that on this 22nd day of December, 2021, a copy of the foregoing was served 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

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

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



David E. Murphy