

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-2019-0002911

**FILED**  
JUL - 7 2022  
JOHN T. FREY  
Clerk of the Circuit Court  
of Fairfax County, VA

**DEFENDANT AND COUNTERCLAIM-PLAINTIFF AMBER  
LAURA HEARD'S MOTION TO EXCLUDE TESTIMONY OF BRYAN NEUMEISTER**  
**(\*\*CONFIDENTIAL UNDER SEAL\*\*)**

**FILED UNDER SEAL**

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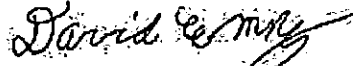
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COMES NOW Defendant and Counterclaim-Plaintiff Amber Laura Heard ("Ms. Heard"), by counsel, in accordance with Rule 4:12 of the Rules of the Supreme Court of Virginia, and moves this Court for entry of an Order excluding the testimony of Bryan Neumeister (the "Motion").

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

May 23, 2022



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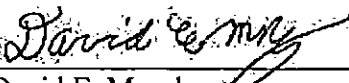
**CERTIFICATE OF SERVICE**

I certify that on this 23<sup>rd</sup> day May, 2022, a copy of the foregoing was served by email, by agreement of the parties, addressed as follows:

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