

VIRGINIA: IN THE CIRCUIT COURT OF FAIRFAX COUNTY

John C. Depp, II

Plaintiff vs.

FILED MOTIONS 2021 APR 13 PM 2:37 JOHN T. FREY CLERK, CIRCUIT COURT FAIRFAX, VA

Civil Action No. CL 2019-02911

Amber Laura Heard

Defendant

Previous Chancery No. CH

SERVE: Benjamin Chew, Andrew Crawford, Camille Vasquez - BROWN RUDNICK, LLP

FRIDAY MOTIONS DAY - PRAECIPE/NOTICE

Moving Party: [] Plaintiff [x] Defendant [] Other

Title of Motion: File Amd Answer/Supp Plea in Bar, Req. Schedule, Stay Disc. [x] Attached [] Previously Filed

DATE TO BE HEARD: May 28, 2021 Time Estimate (combined no more than 30 minutes): 30 minutes

Time to be Heard: [] 9:00 a.m. with a Judge [] 9:00 a.m. without a Judge [x] 10:00 a.m. (Civil Action Cases) Does this motion require 2 weeks notice? [x] Yes [] No [] 11:30 a.m. (DOMESTIC/Family Law Cases) Does this motion require 2 weeks notice? [] Yes [] No

Case continued from: (Date) continued to: (Date)

Moving party will use Court Call telephonic appearance: [x] Yes [] No

Judge Penney S. Azcarate must hear this motion because (check one reason below):

- [] The matter is on the docket for presentation of an order reflecting a specific ruling previously made by that Judge. [x] This Judge has been assigned to this entire case by the Chief Judge; or, [] The Judge has advised counsel that all future motions, or this specific motion, should be placed on this Judge's Docket; or, [] This matter concerns a demurrer filed in a case where that Judge previously granted a demurrer in favor of demurrant.

PRAECIPE by: Elaine Charlson Bredehoft for Def/CC Plaintiff Charlson Bredehoft Cohen & Brown, P.C. Printed Attorney Name/ Moving Party Name Firm Name

11260 Roger Bacon Drive, Suite 201, Reston, VA 20190 Address

(703) 318-6800 (703) 318-6808 23766 ebredehoft@cbcbllaw.com Tel. No. Fax No. VSB No. E-Mail Address

CERTIFICATIONS

I certify that I have in good faith conferred or attempted to confer with other affected parties in an effort to resolve the subject of the motion without Court action, pursuant to Rule 4:15(b) of the Rules of the Supreme Court of Virginia; and, I have read, and complied with, each of the Instructions for Moving Party on the reverse side of this form.

CERTIFICATE OF SERVICE

I certify on the 13th day of April, 2021, a true copy of the foregoing Praecipe was [x] e-mailed [] faxed [] delivered to all counsel of record pursuant to the provisions of Rule 4:15(e) of the Rules of the Supreme Court of Virginia.

FILED
COURT SERVICES
CHARLSON BREDEHOFT, COHEN & BROWN, P.C.
ATTORNEYS AND COUNSELORS AT LAW

CURTIS L. CHARLSON (1925-2010)
ELAINE CHARLSON BREDEHOFT◊
PETER C. COHEN◊
CARLA D. BROWN◊□
ADAM S. NADELHAFT◊%

2021 APR 13 PM 2:38
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

DAPHNE S. GEBAUER◊
CLARISSA K. PINTADO◊
YVONNE A. MILLER•
DAVID E. MURPHY◊◊

◊ALSO ADMITTED IN D.C.
□ ALSO ADMITTED IN MARYLAND
% ALSO ADMITTED IN NEW YORK
◊ ALSO ADMITTED IN WISCONSIN
• ONLY ADMITTED IN MARYLAND

April 13, 2021

BY MESSENGER

John T. Frey, Clerk
Fairfax County Circuit Court
4110 Chain Bridge Road, 3rd Floor
Fairfax, VA 22030

Re: *Case No. CL-2019-0002911 – John C. Depp, II v. Amber Laura Heard*

Dear Mr. Frey:

Enclosed for filing in the above referenced matter, please find:

- Notification of Judicial Notice of Adjudicated Facts and Law Impacting This Matter;
- Defendant Amber Laura Heard's Motion for Leave to File an Amended Answer & Grounds of Defense, a Supplemental Plea In Bar, Request a Hearing, Briefing Schedule, and to Stay Discovery Pending a Ruling on the Plea In Bar, and Memorandum in support;
- Defendant Amber Laura Heard's Amended Answer & Grounds of Defense;
- Defendant Amber Laura Heard's Supplemental Plea in Bar; and
- A Praecipe placing Defendant's Motion on Chief Judge Azcarate's May 28, 2021 docket, at 10:00 AM.

Also enclosed is an extra copy of each filing, which we would appreciate being date-stamped and returned to us via the awaiting messenger.

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WWW.CBCBLAW.COM

John T. Frey, Clerk
April 13, 2021
Page Two of Two

Thank you very much for your assistance.

Very truly yours,

A solid black rectangular box redacting the signature of Elaine Charlson Bredehoft.

Elaine Charlson Bredehoft

Enclosures

cc: Hon. Penney S. Azcarate
Benjamin G. Chew, Esq.
Andrew C. Crawford, Esq.
Camille M. Vasquez, Esq.