

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-2019-000291

FILED  
CIVIL PROCESSING  
2022 JAN 28 P 2:27  
JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

**DEFENDANT AND COUNTERCLAIM-PLAINTIFF AMBER LAURA HEARD'S  
MOTION TO COMPEL RESPONSES TO 3<sup>RD</sup> RFAs AND 14<sup>TH</sup>, 16<sup>TH</sup> AND 17<sup>TH</sup> RFPs  
TO PLAINTIFF AND COUNTERCLAIM-DEFENDANT JOHN C. DEPP, II**

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 respond to Ms. Heard’s Third Requests for Admissions and to fully produce non-privileged documents, without objection, in response to Fourteenth, Sixteenth, and Seventeenth Requests for Production of Documents to Plaintiff and Counterclaim-Defendant John C. Depp, II (“Mr. Depp”) (the “Motion”).

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 fully complied with all procedures in the Conciliator Protocol Order.

January 28, 2022



SB #23766)

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*Counsel to Defendant and Counterclaim-Plaintiff,  
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**CERTIFICATE OF SERVICE**

I certify that on this 28<sup>th</sup> day January 2022, a copy of the foregoing was served by email, by agreement of the parties, addressed as follows:

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