

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

In the Matter of:

JOHN C. DEPP, II,

Petitioner,

v.

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION, BENJAMIN WIZNER, and
ANTHONY ROMERO,

Respondents,

For an Order to compel response to out-of-
state subpoenas served in the action entitled
John C. Depp, II v. Amber Laura Heard, No.
CL2019-0002911 in the Circuit Court of
Fairfax County in the Commonwealth of
Virginia.

Index No. 154545/2021

Part 37

Hon. Arthur F. Engoron

**AFFIRMATION OF JESSICA N.
MEYERS IN SUPPORT OF MOTION
FOR PRO HAC VICE ADMISSION OF
BENJAMIN G. CHEW**

Jessica N. Meyers, an attorney duly admitted to the bar of the State of New York, under the penalties of perjury, hereby affirms the following:

1. I am an attorney with the firm of Brown Rudnick LLP, counsel for Petitioner John C. Depp, II in the above-captioned action. I submit this affirmation in support of Petitioner's application for an order, pursuant to 22 N.Y.C.R.R. §§ 520.11 and 602.2, to admit Benjamin G. Chew *pro hac vice* to practice to the Supreme Court of the State of New York, County of New York.

2. I have been a member of the bar of the State of New York since 2017 and have at all times since then been in good standing. I work in Brown Rudnick LLP's offices located at 7 Times Square, New York, New York 10036.

3. Mr. Chew is a member of the firm Brown Rudnick LLP, working in the offices located at 601 Thirteenth Street NW, Suite 600, Washington, D.C. 20005.

4. Mr. Chew is a member in good standing of the bars of the District of Columbia and the State of Virginia, and to the best of my knowledge, Mr. Chew has never been the subject of any disciplinary proceedings. Copies of Mr. Chew's certificates of good standing are annexed to his affidavit in support of his application.

WHEREFORE, it is respectfully requested that this Court issue an Order, pursuant to 22 N.Y.C.R.R. §§ 520.11 and 602.2, admitting Benjamin G. Chew *pro hac vice* to the Supreme Court of the State of New York, County of New York, and for such other and further relief as this Court may deem just and proper.

Dated: New York, New York
June 14, 2021

/s/ Jessica N. Meyers
Jessica N. Meyers