

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

**AFFIDAVIT OF BENJAMIN G. CHEW
IN SUPPORT OF MOTION FOR *PRO
HAC VICE* ADMISSION**

DISTRICT OF COLUMBIA)
 : ss.
CITY OF WASHINGTON)

BENJAMIN G. CHEW, Esq, being duly sworn, deposes and says:

1. I am partner in the law firm of Brown Rudnick LLP, working at 601 Thirteenth Street N.W., Suite 600, Washington, D.C. 20005, and submit this Affidavit in support of my application to be admitted to this Court *pro hac vice* to participate in the above captioned matter on behalf of Petitioner John C. Depp, II.

2. I am a member in good standing of the bars of the District of Columbia, to which I was admitted on May 24, 1989, and the State of Virginia, to which I was admitted on October 14, 1988. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction, nor have there ever been such proceedings. Attached hereto as Exhibit A is a

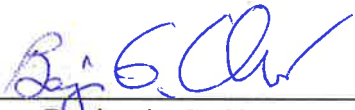
true and correct copy of a Certificate of Good Standing from the District of Columbia Bar and attached hereto as Exhibit B is a true and correct copy of a Certificate of Good Standing from the Virginia State Bar.

3. I am currently admitted *pro hac vice* in the following case in New York state court, New York County: *Black Diamond Capital Management, LLC, et al. v. Oppenheimer Master Loan Fund, LLC, et al.*, Index No. 652519/2015.


4. My participation in this matter will be in association with Jessica N. Meyers of Brown Rudnick LLP, 7 Times Square, New York, New York, 10036, who is listed as the attorney of record in this case and is a member of New York bar.

5. I am familiar with and shall comply with the standards of professional conduct imposed upon members of the New York bar, including the rules of court governing the conduct of attorneys and the Rules of Professional Conduct.

Dated: Washington, District of Columbia
June 14, 2021


Benjamin G. Chew

Sworn to before me this
14th day of June, 2021


Notary Public

