

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

**NOTICE OF MOTION FOR ADMISSION
*PRO HAC VICE***

PLEASE TAKE NOTICE that upon the accompanying Affirmation of Jessica N. Meyers, dated June 14, 2021, the accompanying Affidavit of Benjamin G. Chew, sworn to on June 14, 2021, and the Certificates of Good Standing annexed thereto, Petitioner John C. Depp, by and through its undersigned attorneys, will move this Court in Room 130, Motion Submission, Part, of the Supreme Court of the State of New York, County of New York, located at 60 Centre Street, New York, NY, 10007 at 9:30 A.M. on the 22nd day of June, 2021, or as soon thereafter as counsel can be heard, for an Order pursuant to 22 N.Y.C.R.R. § 520.11 and 602.2 permitting Benjamin G. Chew of the law firm of Brown Rudnick LLP to practice before this Court *pro hac vice* for all purposes on behalf of Petitioner in connection with this action.

Petitioner and Respondent have conferred regarding the relief sought in this Motion.
Respondent does not oppose the Motion.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith in connection with this Motion.

Pursuant to CPLR 2214(b) opposition papers, if any, must be served upon the undersigned at least two days before the return date set forth above.

Dated: New York, New York
June 14, 2021

Respectfully submitted,

By: /s/ Jessica N. Meyers
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Counsel for Petitioner John C. Depp, II