

VIRGINIA:



IN THE CIRCUIT COURT OF FAIRFAX COUNTY

FILED
CIVIL PROCESSING

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

2022 MAY 31 A 8:30

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

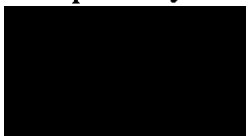
Civil Action No.: CL-2019-0002911

**PLAINTIFF JOHN C. DEPP, II'S OBJECTION TO IMPROPER ARGUMENT AND
MOTION FOR A CURATIVE INSTRUCTION AND REVISED SPECIAL VERDICT
FORM**

Plaintiff John C. Depp, II, by and through his undersigned counsel, hereby moves this Honorable Court to (i) strike defendant's inappropriate argument made during closing argument on May 27, 2022; (ii) instruct the jury to disregard the defendant's inappropriate argument; and (iii) revise the Special Verdict Form with respect to Mr. Depp's affirmative claims against Ms. Heard to conform to the language adopted by the Court in the Jury Instructions.

A memorandum in support of this motion and proposed Order are filed herewith for the Court's consideration.

Respectfully submitted,



w (VSB #29113)

Andrew C. Crawford (VSB #89093)

BROWN RUDNICK LLP

601 Thirteenth Street NW, Suite 600
Washington, DC 20005
Tel.: (202) 536-1785
Fax: (617) 289-0717
bchew@brownrudnick.com
acrawford@brownrudnick.com

Camille M. Vasquez (*pro hac vice*)
Samuel A. Moniz (*pro hac vice*)
BROWN RUDNICK LLP
2211 Michelson Drive
Irvine, CA 92612
Tel.: (949) 752-7100
Fax: (949) 252-1514
cvasquez@brownrudnick.com
smoniz@brownrudnick.com

Jessica N. Meyers (*pro hac vice*)
BROWN RUDNICK LLP
7 Times Square
New York, NY 10036
Tel.: (212) 209-4800
jmeyers@brownrudnick.com

Wayne F. Dennison (*pro hac vice*)
Rebecca M. Lecaroz (*pro hac vice*)
Stephanie P. Calnan (*pro hac vice*)
BROWN RUDNICK LLP
One Financial Center
Boston, MA 02118
Tel.: (617) 8568149
wdennison@brownrudnick.com
rlecaroz@brownrudnick.com
scalnan@brownrudnick.com

*Counsel for Plaintiff and
Counterclaim Defendant John C. Depp, II*

Dated: May 31, 2022