

VIRGINIA :

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

Civil Action No.: CL-2019-0002911

FILED  
COURT SERVICES  
2019 APR 11 2:55  
JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

**CONSENT MOTION TO ADMIT *PRO HAC VICE* ERIC M. GEORGE AND  
RICHARD A. SCHWARTZ AS CO-COUNSEL FOR DEFENDANT**

Pursuant to Rule 1A:4 of the Rules of the Supreme Court of Virginia, undersigned counsel, who is a member in good standing of the Bar of this Court and the Commonwealth of Virginia, requests that this Court admit *pro hac vice* Eric M. George and Richard A. Schwartz, both attorneys in good standing with The State Bar of California (and elsewhere), to serve as associate counsel for the Defendant Amber Laura Heard in the above titled action. In support of this Motion, undersigned counsel respectfully represents the following:<sup>1</sup>

1. Eric M. George and Richard A. Schwartz are attorneys with the law firm of Browne George Ross LLP (“BGR”) with a principal office located in Los Angeles, California, and satellite offices in New York City and San Francisco.

<sup>1</sup> Defendant intends to submit a Motion to Dismiss based upon forum non conveniens. This Motion to Admit is not in any way a waiver of the Motion to Dismiss and to the extent necessary this Motion to Admit is submitted as a special appearance.

2. Messrs. George and Schwartz primarily work out of the BGR offices with the following address and contact information: 2121 Avenue of the Stars, Suite 2800, Los Angeles, California 90067 – Telephone: (310) 274-7100.

3. Messrs. George and Schwartz are both attorneys in good standing in the State of California, admitted to practice before the state and federal courts in California as detailed further within the respective sworn Applications for Admission *Pro Hac Vice* attached hereto as Exhibits A and B. The required application fee has been submitted along with this Motion for each Application as required by Rule 1A:4 of the Rules of the Supreme Court of Virginia.

4. Messrs. George and Schwartz have not been disciplined by any Bar of any state nor have they been sanctioned by any court.

5. Messrs. George and Schwartz have not sought admission *pro hac vice* in the courts of the Commonwealth of Virginia in the last twelve months.

6. The undersigned moves that Eric M. George and Richard A. Schwartz be permitted to appear in this Court as *pro hac vice* counsel on behalf of Defendant Amber Laura Heard for all purposes permitted under the Rules of the Supreme Court of Virginia.

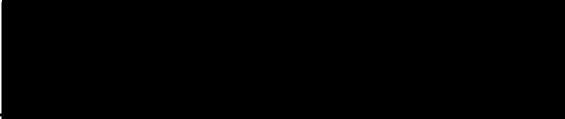
7. Undersigned local counsel, Timothy J. McEvoy and Sean Patrick Roche, are members in good standing of the Bar of the Commonwealth of Virginia and at least one shall sign all pleadings and personally appear in all proceedings conducted before this Court.

WHEREFORE, the undersigned moves this Court for an Order admitting Eric M. George and Richard A. Schwartz, *pro hac vice*, for the limited purpose of appearing and participating in this action as *pro hac vice* counsel for Defendant Amber Laura Heard.

Dated: April 11, 2019

Respectfully submitted,

By:

  
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Sean Patrick Roche, Esq. (VSB No. 71412)  
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**Cameron** / **McEvoy**  
P.L.L.C.

**CERTIFICATE OF SERVICE**

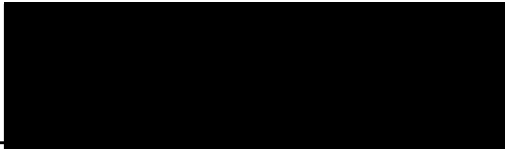
I HEREBY CERTIFY that on the 11<sup>th</sup> day of April 2019, I served the foregoing via First Class Mail (postage prepaid) and electronic mail upon the following:

Benjamin G. Chew (VSB No. 29113)  
Elliot J. Weingarten (*pro hac vice* application forthcoming)  
Andrew C. Crawford (VSB # 89093)  
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Brittany Whitesell Biles (*pro hac vice* application forthcoming)  
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*Counsel for Plaintiff John C. Depp, II*

  
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