

VIRGINIA: IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II

Plaintiff

vs.

FILED  
COMPUTER SECTION

Civil Action No. CL2019-02911

2019 OCT -7 AM 11:49

Previous Chancery No. CH

AMBER LAURA HEARD

Defendant

JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

SERVE:

FRIDAY MOTIONS DAY - PRAECIPE/NOTICE

Moving Party:  Plaintiff  Defendant  Other

Title of Motion: DEMURRER AND PLEA IN BAR Attached  Previously Filed (As Attachment to 9/5/19 Motion for Leave)

DATE TO BE HEARD: 11/22/2019 (if Leave is Granted) Time Estimate (combined no more than 30 minutes): 30 Min

Time to be Heard:  9:00 a.m. with a Judge  9:00 a.m. without a Judge

10:00 a.m. (Civil Action Cases) Does this motion require 2 weeks notice?  Yes  No

11:30 a.m. (DOMESTIC/Family Law Cases) Does this motion require 2 weeks notice?  Yes  No

Case continued from: (Date) continued to: (Date)

Moving party will use Court Call telephonic appearance:  Yes  No

Judge Bruce D. White must hear this motion because (check one reason below):

- The matter is on the docket for presentation of an order reflecting a specific ruling previously made by that Judge.
- This Judge has been assigned to this entire case by the Chief Judge; or,
- The Judge has advised counsel that all future motions, or this specific motion, should be placed on this Judge's Docket; or,
- This matter concerns a demurrer filed in a case where that Judge previously granted a demurrer in favor of demurrant.

PRAECIPE by: Joshua R. Treece, Esq./ Amber Laura Heard  
Printed Attorney Name/ Moving Party Name

WOODS ROGERS PLC  
Firm Name

10 S. Jefferson Street, Suite 1400, P.O. Box 14125, Roanoke, Virginia 24011  
Address

504-983-7730  
Tel. No.

540-983-7711  
Fax No.

79149  
VSB No.

jtreece@woodsrogers.com  
E-Mail Address

CERTIFICATIONS

I certify that I have in good faith conferred or attempted to confer with other affected parties in an effort to resolve the subject of the motion without Court action, pursuant to Rule 4:15(b) of the Rules of the Supreme Court of Virginia; and, I have read, and complied with, each of the Instructions for Moving Party on the reverse side of this form.

Moving Party/Counsel of Record

CERTIFICATE OF SERVICE

I certify on the 4th day of October, 2019, a true copy of the foregoing Praecipe was

mailed  emailed  delivered to all counsel of record pursuant to the provisions of Rule 4:15(e) of the Rules of the Supreme Court of Virginia.

Moving Party/Counsel of Record

JOSHUA R. TREECE  
(540) 983-7730  
jtreece@woodsrogers.com

October 4, 2019

FILED  
COMPUTER SECTION  
2019 OCT -7 AM 11:49  
JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

**VIA OVERNIGHT MAIL**

Fairfax Circuit Court  
Attn: Clerk's Office, 3rd Floor  
4110 Chain Bridge Road  
Fairfax, VA 22030

**Re: *John C. Depp II v. Amber Laura Heard*; Case No. 2019-02911;  
November 8, 2019 Praecipe/Notice for Defendant's Motion for Leave to File  
Amended Responsive Pleadings;  
November 22, 2019 Praecipe/Notice for Defendant's Demurrer & Plea in Bar**

Dear Clerk:

Enclosed for filing, please find Defendant's Praecipe/Notice for Defendant's Motion for Leave to File Amended Responsive Pleadings (the "Motion for Leave"). The hearing for the Motion for Leave is being noticed for November 8, 2019, Judge White's first available Friday Motions Day after October 11, 2019.

We are also enclosing for filing, Defendant's Praecipe/Notice for Defendant's Demurrer and Plea in Bar, in the event leave is granted. The hearing for the Demurrer and Plea in Bar is being noticed for November 22, 2019, a date on which Plaintiff's counsel stated they were available, in the event leave is granted.

In advance the hearing on the Demurrer and Plea in Bar, we will work with Plaintiff's counsel and calendar control, as appropriate, to address briefing matters and discuss whether a longer hearing is required, but given the fast-approaching trial date, we wanted to reserve November 22, 2019 for a hearing on the Demurrer and Plea in Bar.

I am also enclosing one (1) copy of each Praecipe submitted herewith. If you would, please file stamp each and return them in the enclosed, prepaid and self-addressed envelope.

Thank you for your assistance and do not hesitate to contact me if you have any questions or concerns.

Fairfax Circuit Court  
October 4, 2019  
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Sincerely,

WOODS ROGERS PLC



Joshua R. Treece

Enclosures

cc: Counsel of Record