

MOTION [REDACTED]CKET  
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VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

JOHN C. DEPP, II,  
Plaintiff,

v.

AMBER LAURA HEARD,  
Defendant.

Civil Action No.: CL-2019-0002911

**PLAINTIFF JOHN C. DEPP, II'S MOTION TO COMPEL DEFENDANT AMBER  
LAURA HEARD'S FURTHER RESPONSES WITHOUT OBJECTIONS AND  
PRODUCTION OF DOCUMENTS IN RESPONSE TO FOURTH REQUESTS FOR  
PRODUCTION**

Plaintiff John C. Depp, II, by and through his undersigned counsel, hereby moves this Honorable Court to compel Defendant Amber Laura Heard to provide supplemental responses without objections, remove improper limiting language, and immediately produce documents in response to Plaintiff's Fourth Requests for Production.

Counsel for Plaintiff hereby certifies that they have in good faith conferred with opposing counsel in an effort to resolve this dispute without court action.

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

Respectfully submitted,  
[REDACTED]  
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Counterclaim Defendant John C. Depp, II*

Dated: February 12, 2021