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9 SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
10 CENTRAL DISTRICT

11 GREGG "ROCKY" BROOKS

12 Plaintiff,

13 v.

14 JOHN C. DEPP, an individual; BRAD
15 FURMAN, an individual; INFINITUM NIHIL,
16 A Californian Corporation; And DOES 1-50

17 Defendants.

18 Case No.: BC713123

19 **PLAINTIFF'S OPPOSITION TO**
20 **DEFENDANTS' MOTION IN LIMINE**
21 **NO. 4 TO EXCLUDE EVIDENCE AND**
22 **ARGUMENT REGARDING DISPUTES**
23 **BETWEEN JOHN C. DEPP, II AND**
24 **NONPARTY AMBER LAURA HEARD**

25 Date: October 7, 2019
26 Time: 8:30 a.m.
27 Location: Dept. 56

28 TO THE HONORABLE COURT, ALL PARTIES AND THEIR ATTORNEYS OF
RECORDS:

Plaintiff, Gregg "Rocky" Brooks ("Plaintiff") hereby submits his opposition to Defendants' MOTION IN LIMINE No. 4 TO EXCLUDE EVIDENCE AND ARGUMENT REGARDING DISPUTES BETWEEN JOHN C. DEPP, II AND NONPARTY AMBER LAURA HEARD AS follows:

A. Defendant's Propensity For Violent Aggressive Behavior Is Relevant To This Case.

Plaintiff contends in his complaint that Defendant John C. Depp, II ("Defendant Depp") was violent and aggressive towards him without provocation, while Plaintiff was doing his job.