VIRGINIA:



IN THE CIRCUIT COURT OF FAIRFAX COUNTY 020 AUG 31 PM 1: 36

JOHN C. DEPP, II

Plaintiff/Counterclaim Defendant,

CLERK, CIRCUIT COURT FAIRFAX, VA

v.

Civil Action No.: CL-2019-0002911

AMBER LAURA HEARD,

Defendant/Counterclaim Plaintiff.

MOTION FOR LEAVE TO FILE EXTENDED BRIEF AND FOR BRIEFING SCHEDULE ON DEMURRER AND PLEA IN BAR

Plaintiff John C. Depp, II ("Mr. Depp"), by and through his undersigned counsel, pursuant to the Rules of the Supreme Court of Virginia, and sub-section 1.05 of Section E of the Fairfax Circuit Court Practice Manual (2018 ed.), hereby files this Motion for Leave to File Extended Brief and for Briefing Schedule on Demurrer and Plea in Bar, and in support thereof states as follows:

- 1. Mr. Depp, by counsel, has filed a Demurrer and Plea in Bar with respect to the Counterclaims filed by Defendant and Counterclaim Plaintiff Amber Laura Heard ("Ms. Heard").
- 2. In accordance with the Rules of the Supreme Court of Virginia, and sub-section 1.05 of Section E of the Fairfax Circuit Court Practice Manual (2018 ed.), Mr. Depp respectfully requests that this Court order a briefing schedule to his Demurrer and Plea in Bar, with a memorandum in support of no more than twenty (20) pages to be filed on or before September 14, 2020, a memorandum in opposition (if any) of no more than twenty (20) pages to be filed on

or before September 28, 2020, and Plaintiff's memorandum of reply of no more than five (5) pages to be filed on or before October 5, 2020.

3. Mr. Depp also requests oral hearing on the Demurrer and Plea in Bar on Friday Motions Day, October 16, 2020, limited to thirty (30) minutes total.

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

Respectfully submitted,

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

Dated: August 31, 2020