## VIRGINIA:



IN THE CIRCUIT COURT OF FAIRFAX COUNTY FEB 24 | A ID 35

JOHN C. DEPP, II

Plaintiff.

JOHN T. FREY: CLERK, CIRCUIT COURT FAIRFAX, VA

v.

Civil Action No.: CL-2019-0002911

AMBER LAURA HEARD

Defendant.

## CONSENT MOTION TO ADMIT PRO HAC VICE SAMUEL A. MONIZ AS CO-COUNSEL FOR PLAINTIFF

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* Samuel A. Moniz, attorney in good standing within the state of California, to serve as associate counsel for Plaintiff John C. Depp, II in the above titled action. In support of this Motion, undersigned counsel respectfully represents the following:

- 1. Samuel A. Moniz is an attorney with the law firm Brown Rudnick LLP ("Brown Rudnick") with a principal office located in Boston, MA and satellite offices located in various locations, including Orange County, California.
- 2. Mr. Moniz works out of the Brown Rudnick office with the following address and contact information: 2211 Michelson Drive, Seventh Floor, Irvine, CA 92612 Telephone: (949) 752-7100.
  - 3. Mr. Moniz is an attorney in good standing in the state of California, admitted to practice before the courts of the state of California, as detailed further within the sworn and notarized Application to Appear *Pro Hac Vice* Before a Virginia Tribunal attached hereto as

Exhibit A. The required application fee has been submitted along with this Motion and Application as required by Rule 1A:4 of the Rules of the Supreme Court of Virginia.

- 4. Mr. Moniz has not been disciplined by any Bar of any state nor has he been sanctioned by any court.
- 5. Mr. Moniz has not sought admission *pro hac vice* in the courts of the Commonwealth of Virginia in the last twelve months.
- 6. The undersigned moves that Samuel A. Moniz be permitted to associate with local counsel and appear in this Court as *pro hac vice* counsel on behalf of Plaintiff John C. Depp, II for all purposes permitted under the Rules of the Supreme Court of Virginia.
- 7. Undersigned local counsel, Benjamin G. Chew and Andrew C. Crawford, 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.
- 8. Counsel for Defendant Amber Laura Heard have consented to the application and admission of Mr. Moniz.

WHEREFORE, the undersigned moves this Court for an Order admitting Samuel A.

Moniz, pro hac vice, for the limited purpose of appearing and participating in this action as pro hac vice counsel for Plaintiff John C. Depp, II.

Respectfully submitted,

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Counsel for Plaintiff John C. Depp, II

Dated: February 24, 2021

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of February 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

Elaine Charlson Bredehoft (VSB No. 23766)

Carla D. Brown (VSB No. 44803)

Adam S. Nadelhaft (VSB No. 91717)

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