

**VIRGINIA:**

**IN THE CIRCUIT COURT OF FAIRFAX COUNTY**

JOHN C. DEPP, II,

Plaintiff,

v.

AMBER LAURA HEARD,

Defendant.

Civil Action No.: CL-2019-0002911

**FILED**  
FEB 18 2022  
JOHN T. FREY  
Clerk of the Circuit Court  
of Fairfax County, VA

**FILED UNDER SEAL**

(Pursuant to the Stipulated Protective Order Entered by the Court on  
June 21, 2021)


**PLAINTIFF JOHN C. DEPP, II'S MOTION TO COMPEL COMPLIANCE WITH  
ORDERS RE FORENSIC IMAGING AND PRODUCTION OF TESTING  
DATA/EXPERT DOCUMENTS; FOR A LIMITED EXPANSION OF ORDER RE  
FORENSIC IMAGING; FOR ORDER COMPELLING MR. DEPP'S FOURTH, NINTH,  
AND TWELFTH REQUESTS FOR PRODUCTION; AND FOR ORDER COMPELLING  
RESPONSE TO MR. DEPP'S FIFTH INTERROGATORIES**

Plaintiff John C. Depp, II, by and through his undersigned counsel, hereby moves this Honorable Court to compel Defendant Amber Laura Heard to comply with the Court's November 8, 2021 order regarding forensic imaging, to produce underlying expert notes and testing data, to produce documents in response to Mr. Depp's fourth, ninth, and twelfth requests for production, and to respond to Mr. Depp's fifth interrogatories.

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,

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

Dated: February 18, 2022