

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

FILED
CIVIL PROCESSING

JOHN C. DEPP, II)

Plaintiff,)

-v-)

AMBER LAURA HEARD)

Defendant,)

2022 FEB -7 P 2:33

JOHN T. FREY
CLERK, CIRCUIT COURT
NO: CL-2019-0002911

PLAINTIFF'S MOTION TO ADMIT PRO HAC VICE
KATHLEEN T. ZELLNER AS PRO HAC VICE COUNSEL

Pursuant to Rule 1A:4 of the Rules of the Supreme Court of Virginia, Plaintiff John C. Depp, II, by and through his undersigned counsel, who has been a member in good standing of the Virginia State Bar since 1988, hereby requests that this Honorable Court admit *pro hac vice* Kathleen T. Zellner, attorney in Good Standing with the Supreme Court of the State of Illinois, to serve as *pro hac vice* counsel for him in the above-captioned matter. In support of this motion, undersigned counsel respectfully represents the following:

1) Kathleen T. Zellner, Esq. is an attorney who is the owner & president of the law firm of Kathleen T. Zellner & Associates, P.C.

2) Ms. Zellner's law firm has the following address and contact information: 4580 Weaver Parkway, Suite 204 Warrenton, Illinois 60555 — Telephone (630) 955-1212.

3) Ms. Zellner is an attorney in good standing in the State of Illinois and is admitted to practice in the State of Illinois, as detailed further within the respective sworn Application for Admission *Pro Hac Vice* attached hereto as **Exhibit A**. The required application fee had been submitted along with this Motion and Application.

4) Ms. Zellner has not been disciplined by any Bar of any state nor has she been sanctioned by any court.

5) Ms. Zellner 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 Kathleen T. Zellner, Esq. be permitted to 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 counsel, Benjamin G. Chew, has been a member in good standing of the Bar of the Commonwealth of Virginia since 1988 and shall sign all pleadings and personally appear in all proceedings conducted before this Court.

8) Undersigned counsel discussed this Application with Defendant's counsel Elaine Charlson Bredehoft, Esq. on February 5, 2022, informed her that I would be filing this Application today, and requested Defendant's consent. Defendant's counsel has not yet had the opportunity to respond.

WHEREFORE, the undersigned moves this Court for an Order admitting Kathleen T. Zellner, Esq., for the limited purposes of appearing and participating in this action as *pro hac vice* counsel for Plaintiff, John C. Depp, II.

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113)
Andrew C. Crawford (VSB No# 89093)
BROWN RUDNICK, LLP
601 Thirteenth Street, N.W.
Washington, D.C. 20005
Telephone: (202) 536-1700
Facsimile: (202) 536-1701
bchew@brownrudnick.com
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Dated: February 7, 2022

APPLICATION TO APPEAR *PRO HAC VICE* BEFORE A VIRGINIA TRIBUNAL

FILED
CIVIL PROCESS

I, Kathleen T. Zellner, the
APPLICANT FIRST NAME MIDDLE NAME LAST NAME SUFFIX

2022 FEB -7 P 2:33

undersigned attorney, hereby apply to this tribunal of the Commonwealth of Virginia,
Fairfax County Circuit Court, to appear as counsel

JOHN T. FREY
FAIRFAX COUNTY CIRCUIT COURT
FAIRFAX, VA

pro hac vice pursuant to Rule 1A:4 of the Rules of the Supreme Court of Virginia.

I further state the following:

- 1. The case in which I seek to appear *pro hac vice* is styled

John C. Depp, II -v- Amber Laura Heard, has
docket number CL-2019-0002911 and is pending in
Fairfax County Circuit Court

This case

- is
- is not

a related or consolidated matter for which I have previously applied to appear *pro hac vice*.

- I have previously applied to appear *pro hac vice* in the following related or consolidated matters:

a. _____
DOCKET NUMBER COURT NAME
DATE OF PRO HAC VICE APPLICATION STYLE OF RELATED OR CONSOLIDATED MATTER
b. _____
DOCKET NUMBER COURT NAME
DATE OF PRO HAC VICE APPLICATION STYLE OF RELATED OR CONSOLIDATED MATTER

- Additional Sheet attached.

- 2. 4544 Glen Kernan Parkway East, Jacksonville FL 32224
APPLICANT'S RESIDENCE
Kathleen T. Zellner & Associates, 4580 Weaver Parkway, #204, Warrenton, IL 60555
APPLICANT'S OFFICE ADDRESS



3. Benjamin G. Chew & Andrew C. Crawford 29113 & 89093
NAME OF LOCAL COUNSEL VSB NUMBER
BROWN RUDNICK, LLP., 601 Thirteenth Street, N.W. / Washington, D.C. 20005
STREET ADDRESS
(202) 536-1701 bchew@brownrudnick.com (202) 536-1700
FAX NUMBER EMAIL ADDRESS TELEPHONE NUMBER

4. John C. Depp, II
NAME OF PARTY TO CASE
Benjamin G. Chew BROWN RUDNICK, LLP., 601 Thirteenth Street NW, Washington, DC
NAME AND ADDRESS OF COUNSEL FOR PARTY

NAME OF PARTY TO CASE

NAME AND ADDRESS OF COUNSEL FOR PARTY

NAME OF PARTY TO CASE

NAME AND ADDRESS OF COUNSEL FOR PARTY

Additional sheet attached.

5. <u>Illinois</u>	<u>05/05/83</u>	<u>6184574</u>
COURT TO WHICH APPLICANT IS ADMITTED	DATE OF ADMISSION	BAR #
_____	_____	_____
COURT TO WHICH APPLICANT IS ADMITTED	DATE OF ADMISSION	BAR #

Additional sheet attached.

6. I am a member in good standing and authorized to appear in the courts identified in paragraph 5.

7. I am not currently disbarred or suspended in any state, territory, United States possession or tribunal.

8. I am not subject to a pending disciplinary investigation or proceeding by
 am subject to a pending disciplinary investigation or proceeding by
any court, agency or organization authorized to discipline me as a lawyer. (If such an
investigation or proceeding is pending, attach to this application and incorporate by
reference a statement specifying the jurisdiction, the nature of the matter under
investigation or being prosecuted, and the name and address of the disciplinary
authority investigating or prosecuting the matter.)

9. Within the past three (3) years, I

have not been disciplined

have been disciplined

by any court, agency or organization authorized to discipline me as a lawyer. (If so,
attach to this application and incorporate by reference a statement specifying the
name of the court, agency or organization imposing discipline, the date(s) of such
discipline, the nature of the complaint or charge on which discipline was imposed,
and the sanction.)

10. Within the last twelve (12) months preceding this application, I

have not sought admission *pro hac vice* under this rule.

have sought admission *pro hac vice* under this rule. (If so, attach to this
application and incorporate by reference a copy of the order of the tribunal
granting or denying your previous application. Such order(s) must include the
name of the tribunal, the style of case and the docket number for the case(s) in
which you filed an application and whether the application was granted
or denied.)

Order(s) attached and incorporated by reference.

11. I hereby consent to the jurisdiction of the courts and agencies of the Commonwealth
of Virginia and of the Virginia State Bar and I further consent to service of process at
any address(es) required by this Rule.

12. I agree to review and comply with appropriate rules of procedure as required in the case for which I am applying to appear pro hac vice.

13. I understand and I agree to comply with the rules and standards of professional conduct required of members of the Virginia State Bar.

2/2/22.....
DATE SIGNATURE OF APPLICANT

Commonwealth/State of Illinois.....

[] City [] County of Cook.....

Subscribed and sworn to/affirmed 2/2/22.....
DATE

NOTARY PUBLIC
My commission expires: 5/21/2025



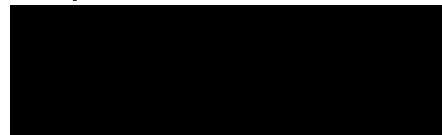
Certificate of Admission To the Bar of Illinois

I, Cynthia A. Grant, Clerk of the Supreme Court of Illinois, do hereby certify that

Kathleen T. Zellner

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 05/05/1983 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto
subscribed my name and affixed the
seal of said Court, this 20th day of
January, 2022.



Clerk,
Supreme Court of the State of Illinois



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IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II

Plaintiff,

-v-

AMBER LAURA HEARD

Defendant,

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NO: CL-2019-0002911

ORDER

Upon Consideration Plaintiff's Motion to Admit Kathleen T. Zellner as *Pro Hac Vice* Counsel ("Plaintiff's Motion"), the Application thereto, and being fully advised, it is, this ____ day of February, 2022, hereby ORDERED as follows:

1. Plaintiff's Motion is GRANTED;
2. Kathleen T. Zellner, Esq. is admitted as *pro hac vice* counsel in the above-captioned matter.

SO ORDERED.

The Honorable Penney S. Azcarate
CHIEF JUDGE

Compliance with Rule 1:13 requiring the endorsement of counsel of record is modified by the Court, in its discretion, to permit the submission of the following electronic signatures of counsel in lieu of an original endorsement or dispensing with endorsement.

WE ASK FOR THIS:



29113)
(VSD No. 89093)

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Leo J. Presiado (*pro hac vice*)
Camile M. Vasquez (*pro hac vice*)
Samuel A. Moniz (*pro hac vice*)

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cvasquez@brownrudnick.com

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

SEEN:

Elaine Charlson Bredehoft (VSB No. 23766)
Adam S. Nadelhaft (VSB No. 91717)
Clarissa K. Pintado (VSB No. 86882)
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*Counsel for Defendant and
Counterclaim-Plaintiff, Amber Laura Heard*

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of February 2022, I caused a copy of the foregoing was served by email, by agreement of the parties, addressed as follows:

Elaine Charlson Bredehoft (VSB #23766)
Adam S. Nadelhaft (VSB #91717)
Clarissa K. Pintado (VSB # 86882)
David E. Murphy (VSB # 90938)
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*Counsel to Defendant and Counterclaim-Plaintiff,
Amber Laura Heard*

