

VIRGINIA :

IN THE CIRCUIT COURT OF FAIRFAX COUNTY SERVICES

JOHN C. DEPP, II

Plaintiff,

v.

AMBER LAURA HEARD

Defendant.

FILED
2019 SEP -5 3:38

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

Civil Action No.: CL-2019-0002911

MOTION TO ADMIT *PRO HAC VICE* ROBERTA A. KAPLAN AS CO-COUNSEL FOR DEFENDANT

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* Roberta A. Kaplan, attorney in good standing with The State Bar of New York, to serve as an associate counsel for the Defendant Amber Laura Heard in the above titled action. In support of this Motion, undersigned counsel respectfully represents the following:

1. Roberta A. Kaplan is an attorney with the law firm of Kaplan Hecker & Fink LLP (“KHF”) located in New York, New York.
2. Ms. Kaplan works out of the KHF office with the following address and contact information: 350 Fifth Avenue, Suite 7110, New York, New York 10118 – Telephone: (212) 763-0883.
3. Ms. Kaplan is an attorney in good standing in the State of New York, admitted to practice before the state and federal courts in New York as detailed further within the respective sworn Application for Admission *Pro Hac Vice* attached hereto as Exhibit A. The required

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

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

5. Ms. Kaplan has sought, and received, admission *pro hac vice* in the courts of the Commonwealth of Virginia in the last twelve months in one case, and the order granting her admission *pro hac vice* is included in her application.

6. The undersigned moves that Roberta A. Kaplan be permitted to appear in this Court as *pro hac vice* counsel on behalf of Defendant Amber Laura Heard for all purposes permitted under the Rules of the Supreme Court of Virginia.

7. Undersigned local counsel, J. Benjamin Rottenborn and Joshua R. Treece, 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.

WHEREFORE, the undersigned moves this Court for an Order admitting Roberta A. Kaplan, *pro hac vice*, for the limited purpose of appearing and participating in this action as *pro hac vice* counsel for Defendant Amber Laura Heard.

Dated: September 5, 2019

Respectfully submitted,

Amber L. Heard

By Counsel: 

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CERTIFICATE OF SERVICE

I certify that on this 5th day of September, 2019, a copy of the foregoing Motion to Admit *Pro Hac Vice* Roberta A. Kaplan as Co-Counsel for Defendant shall be served by first class mail, postage prepaid, and by email, upon:

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