

# EXHIBIT 17

**VIRGINIA:**

**IN THE CIRCUIT COURT OF FAIRFAX COUNTY**

JOHN C. DEPP, II,

Plaintiff and Counter-defendant,

v.

AMBER LAURA HEARD,

Defendant and Counter-plaintiff.

Civil Action No.: CL-2019-0002911

**DECLARATION OF BEN WIZNER**

1. My name is Ben Wizner. I am employed by the American Civil Liberties Union Foundation (“ACLU”) in the position of Director of the Speech, Privacy, and Technology Project. I am familiar with the facts set forth in this Declaration based on my position with the ACLU.

2. The ACLU Women’s Rights Project, a project within the Ruth Bader Ginsburg Liberty Center of the ACLU Legal Department, engages in systemic legal reform to ensure that everyone has the freedom to live, work, and learn regardless of gender. One of its priorities is holding institutions accountable for gender-based violence and requiring them to adopt systems to prevent such violence before it happens

3. Domestic violence, sexual assault, and other forms of gender-based violence deprive women and girls of their fundamental ability to live with dignity. Women and girls experience domestic violence and sexual assault at alarming rates. Governments, institutions, laws, and policies contribute to the systematic devaluation of the lives and safety of women and girls by failing to respond to gender-based violence and by discriminating against those

subjected to such violence. Domestic violence and sexual assault can affect women in all walks of life, including celebrities.

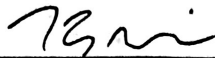
4. Amber Heard is, and was in November 2018, an “ambassador” for the ACLU on Women’s Rights. Part of Ms. Heard’s role as an ambassador for the ACLU is to speak and write on areas the ACLU believes are of public importance, to encourage change and reform.

5. In November 2018, the ACLU suggested Ms. Heard write and assisted her in submitting an Op-Ed piece to *The Washington Post* addressing the reluctance of survivors of domestic violence and sexual assault to report their experiences, and the institutional intimidation and social dynamics that discourage such reporting and protect abusers. Her piece further addressed how these dynamics can cause people to question survivors who report violence. The ACLU regards all of these matters as subjects of public concern and has repeatedly addressed them through litigation, advocacy, and public education. This Op-Ed piece also included discussion of the #MeToo movement, an increase in women in Congress, the Violence Against Women Act, and reduction in schools’ obligations to respond to sexual harassment and assault under Title IX.

6. The ACLU assisted Ms. Heard in placing her Op-Ed piece with *The Washington Post*. In my view, *The Washington Post* is a highly regarded institution and its acceptance of the piece for publication is a further indication of the importance of the issues that it addresses. In the ACLU’s experience, national news outlets like *The Washington Post* do not look to publish Op-Eds on private matters, but rather seek out timely pieces on newsworthy issues that will be of interest to their readers. The fact that *The Washington Post* selected and published Ms. Heard’s Op-Ed is a testament to the importance to its readership of the topics she covered.

I declare under penalty of perjury that the foregoing is true and correct.

January 22, 2021  
Date

  
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Ben Wizner  
American Civil Liberties Union