

# **EXHIBIT 3**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DECLARATION OF AMBER LAURA HEARD**

I, Amber Laura Heard, declare as follows:

1. I am a party in the above-entitled action, and submit this declaration in support of my plea in bar. I have firsthand, personal knowledge of the facts set forth below and if called as a witness could competently testify thereto.

2. In early November 2018, I began to get more actively involved with the American Civil Liberties Union. I had made a donation to the ACLU, and wanted to use my position to advocate for social justice, civil liberties, and other political issues.

3. Anthony Romero, the executive director of the ACLU, introduced me to Jessica Weitz, who in turn suggested the idea that I might write an Op-ed about how my own experience exemplifies the issues faced by those who speak out about abuse and violence.

4. Over the next few days and weeks, I worked on the phone and by email with Jessica and Robin Shulman, a Communications Strategist at the ACLU, to draft an Op-ed that would explain how victims are often intimidated by institutions and social dynamics that protect abusers, and that these dynamics cause people to question victims who report violence.

5. Throughout the process, Jessica told me that the ACLU would handle the placement of the Op-ed in a newspaper. Based on the understanding that newspapers usually write the headline for any Op-ed, I did not write a headline for the Op-ed, nor did Jessica or Robin suggest one to me.

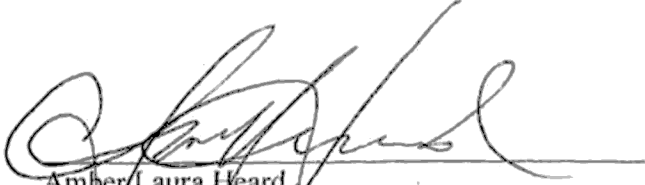
6. On December 14, 2018, Jessica informed me that the Washington Post had agreed to publish the Op-ed. On December 17, 2018, Robin sent me a revised version of the Op-ed she told me reflected the edits the Washington Post suggested and had the suggested headline, "How Institutions Protect Men Accused of Abuse."

7. I am not aware of who at the ACLU communicated with and made arrangements with the Washington Post in connection with the Op-ed. I never spoke with any employee or representative of the Washington Post about the Op-ed prior to its publication. Nor did I see—let alone author, dictate, suggest, or otherwise approve—the online headline "Amber Heard: I spoke

1 up against sexual violence — and faced our culture’s wrath. That has to change.” until I saw that  
2 the Op-ed had been published on the Washington Post’s website with that headline.

3 Executed this 4th day of September 2019, at Los Angeles, California.

4 I declare under penalty of perjury under the laws of the Commonwealth of Virginia that the  
5 foregoing is true and correct.

6  
7   
8 Amber Laura Heard  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28