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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

11 BRIAN WARNER, p/k/a MARILYN
12 MANSON,

13 Plaintiff,

14 v.

15 EVAN RACHEL WOOD, ASHLEY GORE
16 a/k/a ILLMA GORE,

17 Defendants.
18

Case No. 22STCV07568

**SUPPLEMENTAL DECLARATION OF
MARGARET ZIEMIANEK IN SUPPORT
OF DEFENDANT ASHLEY GORE'S
REPLY IN SUPPORT OF SPECIAL
MOTION TO STRIKE COMPLAINT
("ANTI-SLAPP")**

Date: December 1, 2022

Time: 10:00 a.m.

Dept. 50

Before: Hon. Teresa Beaudet

Action Filed: March 2, 2022

1 I, Margaret Ziemianek, hereby declares as follows:

2 1. I am an attorney duly admitted to practice before this Court. I am a Partner
3 of Hanson Bridgett LLP, attorneys of record for Defendant Ashley Gore ("Defendant"). I
4 make this declaration in support of Defendant Ashley Gore's Reply In Support of Special
5 Motion to Strike. I have personal knowledge of the facts set forth herein, except where
6 stated upon information and belief. If called as a witness, I could and would competently
7 testify to the matters stated herein.

8 2. Attached hereto as **Exhibit 9** are true and correct copies of cited excerpts
9 from the October 13, 2022 Deposition of Ashley Gore a/k/a Illma Gore.

10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct.

12 Executed this 22nd day of November, 2022 in San Francisco, California.

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15 _____
Margaret Ziemianek

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EXHIBIT 9

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

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5 _____
BRIAN WARNER, p/k/a MARILYN MANSON,

6 Plaintiff,

7 vs.

Case No.:

8 22STCV07568

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EVAN RACHEL WOOD; ASHLEY GORE,

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a/k/a ILLMA GORE,

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Defendants.

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CONFIDENTIAL

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VIDEO-RECORDED ZOOM VIDEOCONFERENCE DEPOSITION OF

17

ASHLEY GORE, A/K/A ILLMA GORE

18

Tuesday, October 25, 2022

19

20

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Reported by:

22

Michelle Bulkley, CSR #13658

23

JOB No. 5520113

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PAGES 1 - 153

1 Q Okay. And, in fact, before we get to 12:43
2 whether it was true or false, you told Katheryn and
3 Evan and perhaps Esmé that the "Groupie" video shot
4 by Mr. Warner included an underage actress in a
5 simulated sex scene; correct? 12:44

6 MS. ZIEMIANEK: Objection. Misstates
7 testimony; lacks foundation.

8 THE WITNESS: No.

9 BY MR. KING:

10 Q What did you tell them about the role of 12:44
11 the actress in the "Groupie" film?

12 A I told them that a relative reached out
13 worried about the age of the actress.

14 Q Is that the sole content of what you told
15 Katheryn McGaffigan regarding "Groupie"? 12:44

16 MS. ZIEMIANEK: Objection. Misstates
17 testimony.

18 THE WITNESS: From what I recall, yes.

19 BY MR. KING:

20 Q Did you ever mention to anybody what type 12:45
21 of scenes this alleged underage actress participated
22 in?

23 MS. ZIEMIANEK: Objection. Lacks
24 foundation.

25 THE WITNESS: No. 12:45

1 BY MR. KING: 12:45

2 Q Is it your belief that anybody who uses an
3 underage actress in any film is committing some
4 crime?

5 MS. ZIEMIANEK: Objection. Vague; outside 12:45
6 the scope's -- outside the scope of the Court's
7 order; argumentative.

8 THE WITNESS: My belief on a crime being
9 committed was based in Brian Warner's words.

10 BY MR. KING: 12:45

11 Q Nothing else?

12 A No.

13 Q So based upon Brian Warner's words in the
14 "Dinner For Five" video? Is that what you're
15 talking about? 12:45

16 A From what I recall, there are multiple
17 videos of him speaking about the film.

18 Q And from those videos, you concluded that
19 Mr. Warner had committed a crime?

20 A Mr. Warner, in those videos, spoke about 12:46
21 being prosecuted, his legal team and manager worried
22 about his indictment.

23 Q And based upon those, you reached a
24 conclusion that Mr. Warner had committed a crime;
25 right? 12:46

1 A With the videos released about violence 12:46
2 and the objectification of women, it didn't make
3 sense to me why this video wouldn't be released, why
4 people would talk about him being prosecuted.

5 Q You concluded that the "Groupie" video 12:46
6 demonstrated that Mr. Warner had committed a crime;
7 right?

8 MS. ZIEMIANEK: Objection. Asked and
9 answered.

10 THE WITNESS: Yes. 12:47
11 BY MR. KING:

12 Q And you communicated to people that
13 Mr. Warner had committed a crime by using a minor in
14 the film "Groupie"; correct?

15 MS. ZIEMIANEK: Objection. Lacks 12:47
16 foundation; misstates testimony.

17 THE WITNESS: I believed a minor was used
18 in the film, yes.

19 BY MR. KING:

20 Q Well, but you told people that that was a 12:47
21 crime; right?

22 MS. ZIEMIANEK: Objection. Misstates
23 testimony; lacks foundation.

24 THE WITNESS: I don't recall telling
25 people that that was a crime. 12:47

1 THE WITNESS: This was not necessarily 02:29
2 from my recollection of others but of the relative
3 who reached out and of Brian Warner's own words.

4 BY MR. KING:

5 Q Right. I just want to know, as of 02:29
6 October 3, 2020, what you thought was horrifying
7 about the content of the video.

8 MS. ZIEMIANEK: Objection. Lacks
9 foundation; misstates testimony.

10 THE WITNESS: Because Mr. Warner's visuals 02:29
11 are violent generally and objectify women or glorify
12 domestic violence. It seemed odd that he would
13 speak of indictment and prosecution, or his manager
14 would, and not release the film if it was generally
15 violent. 02:30

16 The general understanding I had from the
17 "Dinner For Five" interview and his other interviews
18 was that he objectified underage fans, joked about
19 it, and the general idea from the relative and from
20 people watching it was that the actress was young. 02:30

21 BY MR. KING:

22 Q Did anybody tell you that the "Groupie"
23 video glorified domestic violence?

24 A Not that I recall, no.

25 Q Did anybody tell you that the "Groupie" 02:30

1 Q And did anybody tell you that the 02:31
2 "Groupie" video was violent?

3 A Yes.

4 Q Who told you that?

5 A I don't recall specifically anyone who had 02:32
6 seen the film discussed -- was generally -- found it
7 horrifying and violent.

8 Q But you don't remember who told you that?

9 (Telephonic interruption.)

10 Q Correct? 02:32

11 A Not specifically. Yeah. Sorry.

12 Q Well, generally, do you recall who told
13 you that the film was horrifying and violent?

14 A I believe it was the names that I provided
15 earlier. 02:32

16 Q Katheryn McGaffigan?

17 MS. ZIEMIANEK: Objection. Lacks
18 foundation; misstates prior testimony.

19 THE WITNESS: No.

20 BY MR. KING: 02:32

21 Q Evan Wood?

22 A Yes, I believe so.

23 Q What did she tell you about the content of
24 the film?

25 A I don't recall specifics about the 02:33

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath; that
8 a record of the proceedings was made by me using
9 machine shorthand which was thereafter transcribed
10 under my direction; that the foregoing transcript is
11 a true record of the testimony given.

12 I further certify that I am neither
13 financially interested in the action nor a relative
14 or employee of any attorney or any party to this
15 action.

16 IN WITNESS WHEREOF, I have this date
17 subscribed my name this 27th day of October, 2022.

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19
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21 <%1482,Signature%>
MICHELLE BULKLEY

22 CSR No. 13658

23
24 The dismantling of transcript will void Reporter's
25 certificate.