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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.

Case No. 22STCV07568

**DECLARATION OF ASHLEY GORE 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

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1 I, Ashley Gore, declare as follows:

2 1. I am a Defendant in the above-entitled action. I make this declaration in
3 support of my Special Motion to Strike the Complaint. I have personal knowledge of the
4 facts set forth herein, except as to those stated on information and belief and, as to
5 those, I am informed and believe them to be true. If called as a witness, I could and
6 would competently testify to the matters stated herein.

7 2. Exhibit 5 to the Ziemianek Declaration in Support of Special Motion to Strike
8 (filed in this action on May 24, 2022) is a transcript of the Marilyn Manson *Dinner for Five*
9 interview that I reviewed in 2016 or 2017 and discussed in my deposition. Exhibit 6 to the
10 Ziemianek Declaration is another online article I reviewed at or about the same time,
11 which includes similar statements from Warner concerning why *Groupie* was never
12 released. As I stated in my deposition, I relied on Warner's statements cited in these
13 materials in forming my belief that *Groupie* depicted illegal content.

14 3. Exhibit 8 to the Ziemianek Declaration is an article I read in or about 2019,
15 and is among the articles I mentioned in my deposition.

16 4. I never pressured, recruited, or coerced anyone to make false accusations
17 against Warner.

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

20 Executed on this 22nd day of November 2022.

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DocuSigned by:

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Ashley aka Ilma Gore