DECLARATION OF ANTOINE BERNARD IN SUPPORT OF DEFENDANTS' MOTION TO STRIKE PURSUANT TO CAL. CODE CIV. PROC. § 425.16

I, Antoine Bernard, declare as follows:

1. I am the Chief Executive Officer of Defendant FEDERATION INTERNATIONAL DES DROITS DE L'HOMME ("FIDH"). I make this declaration in support of Defendants' Motion to Strike Pursuant to Cal. Code Civ. Proc. § 425.16 in the matter of *Orian et al. v. FIDH et al.*, United States District Court, Central District of California, Case No. CV 11-6904. The following facts are true of my own personal knowledge, except for those matters stated on information and belief, which matters I believe to be true. If called to testify, I could and would competently attest to the matters stated herein.

2. I have been working at FIDH since 1991. In my current position as Chief Executive Officer, I supervise all FIDH's activities under the authority of the International Board of the organization and in particular of its elected president.

3. In 2006, FIDH voluntarily undertook to make changes to an Internet posting relating to plaintiffs in this matter. FIDH was under no compulsion to do so by way of legal process.

4. Since that date, FIDH has not changed the Internet posting or published or republished any matter related to plaintiffs in this matter on the Internet. To my knowledge, FIDH has not published or republished any matter related to plaintiffs in this matter in any other form or media.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 14, 2011.

A. Bernard

Antoine BERNARD