

## **AFFIDAVIT OF DR. MICHAEL T. MOTLEY**

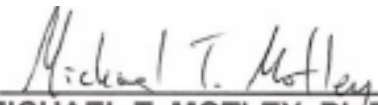
Having been duly sworn, the following is true to the best of my knowledge, information, and belief:

1. If called to the stand, I am competent to testify to the contents herein.
2. This Affidavit is based on my personal knowledge unless otherwise indicated.

\*\*\*\*\*

**93.** Many of my opinions herein are empirical questions. That is to say, it is possible to conduct social-scientific research to test the hypothesis (or opinion) that the inattentional and subliminal stimuli in Drive (and in the Nike ad) discussed above do indeed have the effects predicted above on individuals already predisposed toward anti-Semitism. And it is possible to run the same test for subjects more neutral toward Jews. In fact, as a social scientist, I seriously considered running just such an experiment. I am confident, however, that such a study would not be allowed by the Human Subjects Committee, i.e., Institutional Review Board (IRB) of my institution (University of California at Davis). I sat on that IRB for over 30 years, and Chaired it for several years. I am confident that the IRB would consider it unethical to expose subjects (usually college sophomores) to the stimuli discussed above because of the chance that such exposure would trigger or exacerbate biases toward Jews. It is my opinion that the use of those symbols is unethical for the same reason in Drive and in the Nike ad.

\*\*\*\*\*

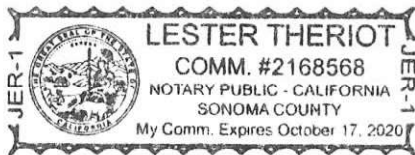
  
\_\_\_\_\_  
MICHAEL T. MOTLEY, Ph.D.

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
County of Sonoma

Subscribed and sworn to (or affirmed) before me on this 13  
day of April, 2017, by Michael T. Motley

proved to me on the basis of satisfactory evidence to be the  
person~~(s)~~ who appeared before me.



(Seal)

Signature Lester Theriot