

Affidavit

I, the undersigned, Eric Goldstein, holder of an American passport no. [REDACTED], after having been warned by my attorney Tahila Meir of my duty to state the truth or be subject to the penalties of law should I fail to do so, affirm the following:

1. I am the Deputy Director, Middle East and North Africa Division of Human Rights Watch, Petitioner No. 1 (hereinafter: "HRW").
2. I am making this affidavit in support of AP 36759-05-18 *Human Rights Watch, et al. v. Minister of Interior, et al.* (hereinafter "the petition"), and in response to the facts and allegations made in the hearing held on March 11, 2019, which have been translated to English for me and/or explained to me by HRW's attorneys, Michael Sfard, Emily Schaeffer Omer-Man and Sophia Brodsky.
3. All of the facts detailed below are either known to me personally or have been verified by me and confirmed by fellow senior representatives of HRW.

A. HRW's Social Media Policy:

- a. HRW researchers and advocates are encouraged to maintain a Twitter account and use it to advance HRW reports, positions and activity. HRW staff are expected to conform their tweets to HRW's policies and positions on human rights issues and avoid expressing conflicting views or positions.
- b. Petitioner No. 2, Omar Shakir (hereinafter "Shakir"), has served as HRW's Israel and Palestine Director since October 2016, and therefore, since then, his Twitter account is the official Twitter account for the HRW Israel and Palestine Director.
- c. HRW has never repudiated Shakir's tweets on Twitter nor any statement he has made on other social media platforms (such as Facebook) or in interviews. The Tweets, posts and interviews in question in the petition express HRW's positions.
- d. Shakir's Twitter account expressly lists his title as HRW's Israel Palestine Director. The account has a Twitter "verified" badge authenticating that he is who he purports to be.

4. I hereby affirm with my name and signature below that the contents of this affidavit are true and correct.

[Redacted Signature]

Eric Goldstein

I hereby confirm that on the 14th day of March 2019, Eric Goldstein appeared before me, Adv. Tehila Meir and I identified him based on a Passport No. [Redacted], and that after I warned him of his duty to state the truth or otherwise be subject to the penalties of law, he confirmed the above affidavit with his signature.

[Handwritten Signature]

Signature

17-03-18

Title

תהילה מאיר, עו"ד
מ.ר. 71836

Stamp

Date: 14.3.2019