

DECLARATION OF BRYAN BURNEY

1. My name is Bryan Burney. I am the marketing manager for Houston Texans quarterback Deshaun Watson, and have had this role for more than three years. I have personal knowledge of the facts stated in this declaration; they are true and correct.
2. In mid-January 2021, I spoke with an individual who I believe is the Plaintiff, identified as “Jane Doe,” in Jane Doe v. Deshaun Watson, Cause No. 2021-15613, currently pending in Harris County, Texas. It is clear to me that the person I spoke with met with Deshaun on December 28, 2020, the same day that Jane Doe contends in her petition that she met with Deshaun. When I spoke with Ms. Doe in January, she stated that she wanted a “settlement” from Deshaun, though what exactly she wished to “settle” was not clear to me.
3. During my discussions with Ms. Doe, I questioned the factual basis for the “settlement” that she was requesting from Deshaun. Ms. Doe informed me that she was asking to be paid \$30,000 for what she referred to as “indefinite silence” about her encounter with Deshaun. I asked her what she would be silent about and whether anything had happened with Deshaun against her will. She confirmed that everything that occurred was consensual during her encounter with Deshaun. I asked Ms. Doe why Deshaun should pay for silence regarding something that was consensual – whatever it was. She said that it was a matter that both she and Deshaun would wish to keep secret and that she would need to be paid for her “silence.”
4. After my conversation with Ms. Doe, I received a call from a man purporting to be her “business manager.” Ms. Doe’s business manager told me that her encounter with Deshaun would be embarrassing if revealed and that Deshaun should pay to keep the matter secret.
5. I told this individual that his demand to be paid for not revealing a consensual interaction between two adults was extortion.

6. He responded, “It’s not extortion, it’s blackmail.”
7. I informed this individual that Deshaun would not be paying the \$30,000 requested.
8. In the years that I have known Deshaun, I have known him to be a respectful, decent human being. I do not believe him capable of the conduct that “Jane Doe” has anonymously accused him of in this case. This conduct is also completely inconsistent with multiple statements made by Jane Doe and by her “business manager,” indicating that her encounter with Deshaun involved only consensual activity.

JURAT PURSUANT TO TEXAS CIVIL PRACTICE & REMEDIES CODE § 132.001

My name is Bryan Burney, and my address is 23091 Mill Creek Drive Laguna Hills, CA 92653. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Kings County, State of New York, on the 23rd day of March, 2021.



BRYAN BURNEY