

EXHIBIT E

ELECTRONICALLY FILED 10/16/2013 11:09:18 AM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

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IN THE CIRCUIT COURT OF THE
SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

Case No. 12012447CI-011

-----)
TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

vs.

HEATHER CLEM, GAWKER MEDIA, LLC a/k/a
GAWKER MEDIA, GAWKER MEDIA GROUP, INC.
a/k/a GAWKER MEDIA, GAWKER ENTERTAINMENT,
LLC, GAWKER TECHNOLOGY, LLC, GAWKER SALES,
LLC, NICK DENTON, A.J. DAULERIO,
KATE BENNERT and BLOGWIRE HUNGARY SZELLEMI
ALKOTAST HASZNOSITO KFT a/k/a GAWKER MEDIA,

Defendants.
-----)

VIDEOTAPED DEPOSITION OF

SCOTT KIDDER

New York, New York

Tuesday, October 1, 2013

Reported by:
Toni Allegrucci
JOB NO. 10069

1 S. Kidder
2 with Gawker Media, LLC and/or its affiliated
3 company?

4 A. So you are asking me on behalf of
5 Gawker Media, LLC.

6 MR. BERLIN: I, I -- my objection
7 stands, but you may certainly go ahead
8 and answer the question if you can.

9 A. Yes, I -- Gawker Media, LLC is
10 aware of Gawker Media Group, Inc.

11 Q. What is Gawker Media Group, Inc.?

12 A. It's a holding company whose sole
13 purpose is to facilitate ownership in
14 Gawker Media, LLC and Kinja, which is a
15 Hungarian company.

16 Q. Who are the officers of Gawker
17 Media Group, Inc.?

18 A. So you are asking Gawker Media, LLC
19 is aware of who --

20 MR. BERLIN: I'm just going to
21 ask -- make the same objection and you
22 can go ahead and answer the question if
23 you can.

24 MR. MIRELL: And let me refer you,
25 please, just so we can try to minimize

1 S. Kidder

2 the questions to the best of his
3 ability.

4 MR. MIRELL: Okay. Thank you very
5 much.

6 A. The officers of Gawker Media Group,
7 Inc. are Nicholas Denton and Scott Kidder.

8 Q. And when was Gawker Media Group
9 formed?

10 A. I don't know the specific date, but
11 it was, I can speculate it was around 2009 as
12 part of a restructuring.

13 Q. And what is your title within
14 Gawker Media Group?

15 A. You are asking me personally?

16 Q. Yeah.

17 A. Vice president of operations.

18 Q. Can you describe for me the
19 relationship between Gawker Media Group, the
20 functional relationship between Gawker Media
21 Group, Inc. and Gawker Media, LLC?

22 A. Gawker Media Group, Inc. owns
23 100 percent of the equity of Gawker Media,
24 LLC.

25 Q. And where is it incorporated?

1 S. Kidder

2 A. It, it seemed to.

3 Q. Do you have any idea for how long
4 the Hulk Hogan sex tape video excerpts were
5 unavailable?

6 A. I don't know a specific time frame,
7 But I, I'm sure that we noticed rather
8 quickly, so I'd imagine, you know, somewhere
9 between 24 and 36 hours, but that's just a
10 guess.

11 Q. All right. So you are not aware of
12 any period longer than that 24 to 36 hour
13 time frame when the Hulk Hogan sex tape video
14 was unavailable prior to the court order that
15 was entered in this matter?

16 A. No.

17 Q. Okay. If the story was unavailable
18 for 24 to 36 hours, why would that have been
19 of concern to Gawker Media?

20 A. Because Gawker Media publish --
21 published the story and Gawker Media, LLC is
22 solely responsible for its content and
23 Gawker Media gets to make the determination
24 when and if any stories come down outside of
25 a court order, not a random vendor.