

EXHIBIT C

ELECTRONICALLY FILED 10/18/2013 3:11:24 PM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

From: Seth Berlin
Sent: Tuesday, October 08, 2013 4:10 PM
To: 'Charles Harder'
Cc: Gregg D. Thomas; kturkel@bajocuva.com; Christina K Ramirez (cramirez@BajoCuva.com); Seth Berlin; Paul Safier; Alia Smith; Julie Ehrlich; dhouston@houstonatlaw.com; Rachel E. Fugate
Subject: RE: Bollea-Gawker Media; Video re Bollea's Deposition

Charles,

We intend to videotape Mr. Bollea's deposition (and also Mr. Clem's) for use at trial. The fact that Gawker is a media company and operates websites should not preclude it from the legitimate use of a videotaped deposition to defend itself at trial. Indeed, most of our practice – and that of Thomas LoCicero – involves representing news organizations, many of which broadcast or publish video. We are unaware of any authority denying them the ability to videotape a deposition for that reason, and note that any concerns about the disclosure of confidential testimony, whether videotaped or otherwise, can be addressed by the Protective Order already in place in this case.

I also am particularly troubled by the timing of your request, given that just last week plaintiff completed the videotaped depositions of my clients, who are themselves subject to media interest – particularly in light of the fact that Mr. Bollea is now a partner in a web design and hosting company, which just published a widely-viewed video of Mr. Bollea himself.

Should you wish to arrange a meet and confer call about this subject, please let me know and I will be happy to find a time to do so. Thank you.

Seth

Seth D. Berlin



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From: Charles Harder [<mailto:charder@hmafirm.com>]
Sent: Monday, October 07, 2013 3:34 PM
To: Seth Berlin
Cc: Gregg D. Thomas; kturkel@bajocuva.com; Christina K Ramirez (cramirez@BajoCuva.com)
Subject: Bollea-Gawker Media; Video re Bollea's Deposition

Dear Seth:

Counsel for Bubba Clem makes a good point that Gawker Media should not be permitted to videotape Mr. Clem's deposition and, for the same reason, Gawker Media also should not be permitted to videotape Terry Bollea's deposition. Gawker Media owns websites, including Gawker.com, that post scandalous information about celebrities, including the Hulk Hogan sex tape. Gawker.com or one of its sister sites likely will post excerpts of Mr. Bollea's videotaped deposition, if video of the deposition is taken. Any such postings would serve to further invade Mr. Bollea's privacy. A videotaped deposition is unnecessary for the trial because

Gawker Media still would have a transcript of the deposition that it could use to impeach Mr. Bollea or for whatever other purposes.

Please confirm that Gawker Media agrees that it will not videotape Mr. Bollea's deposition. If we do not receive your agreement, then we will file a Motion for Protective Order on this issue, for hearing on October 29. If you please could let me know your position today or tomorrow, I would appreciate it. Thank you.

Sincerely,

Charles Harder



CHARLES J. HARDER

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