

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

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

vs.

Case No. 12012447CI-011

HEATHER CLEM; GAWKER MEDIA, LLC
aka GAWKER MEDIA; GAWKER MEDIA
GROUP, INC. aka 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 aka
GAWKER MEDIA,

Defendants.

_____ /

AFFIDAVIT OF CHARLES J. HARDER

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

CHARLES J. HARDER, Esq. being duly sworn, deposes and says:

1. I am admitted pro hac vice to practice before this Court and am a partner of Harder Mirell & Abrams LLP, counsel for Plaintiff Terry Gene Bollea in this proceeding. I have personal knowledge of the facts set forth herein.

2. I have spent at least four (4) hours preparing the Opposition to Motion to Compel papers. My standard hourly rate is \$550 per hour. For purposes of justifying my hourly rate, I

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have approximately 17 years of experience as a litigation attorney and I serve as the Editor of the law treatise Entertainment Litigation (Oxford University Press 2011).

3. Dilan A. Esper is an associate at my firm and acted at my direction and under my supervision in researching the applicable law and drafting the motion papers. Mr. Esper informs me, and his time entries reflect, that he spent at least eight (8) hours researching the issues and preparing the Opposition to Motion to Compel. Mr. Esper's standard hourly rate is \$495 per hour. For purposes of justifying his hourly rate, Mr. Esper is a graduate of the University of Southern California Law School and has practiced law for over 17 years.

4. Plaintiff has, thus far, incurred expenses and attorney's fees in the amount of \$6,160.00 to prepare the Opposition to Motion to Compel.

5. I expect that my firm will be required to spend additional time to review and analyze the moving parties' Reply brief, to prepare for and appear at the hearing on the Motion to Compel, and therefore Plaintiff reserves the right to request additional fees for those tasks.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Executed this 23rd day of October, 2013.



CHARLES J. HARDER

Sworn to and subscribed before me this ____ day of _____, 2013 by _____ who is personally known to me or _____ who has produced _____ (type of I.D.) as identification (check one).

*See attached
CA Jurat form
JB*

(Signature)

(Type or Print Name)

Notary Public
My Commission Expires:
Commission No.:

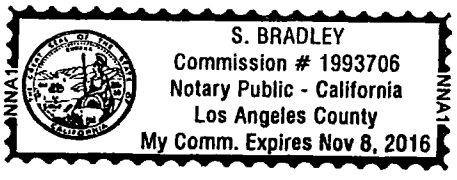
CALIFORNIA JURAT WITH AFFIANT STATEMENT

- See Attached Document (Notary to cross out lines 1-6 below)
- See Statement Below (Lines 1-5 to be completed only by document signer[s], *not* Notary)

Signature of Document Signer No. 1
Signature of Document Signer No. 2 (if any)

State of California
 County of Los Angeles

Subscribed and sworn to (or affirmed) before me on this
23rd day of October, 2013, by
Date Month Year
 (1) Charles J Harder,
Name of Signer



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

(2) _____,
Name of Signer

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

Signature [Handwritten Signature]
Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Further Description of Any Attached Document

Title or Type of Document: Affidavit
 Document Date: 10-23-13 Number of Pages: 2
 Signer(s) Other Than Named Above: _____

RIGHT THUMBPRINT OF SIGNER #1
 Top of thumb here

RIGHT THUMBPRINT OF SIGNER #2
 Top of thumb here