

EXHIBIT 3

ELECTRONICALLY FILED 10/29/2013 8:18:46 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. Cayman Islands.

3 Q. Does it have an agent for service
4 of process?

5 A. I would imagine so. I would
6 speculate that, that it does but I'm not
7 familiar with the service of process process
8 in Cayman Islands.

9 Q. Are there any other officers of
10 Gawker Media Group, Inc. other than yourself
11 and Mr. Denton?

12 A. Not that I'm aware of.

13 Q. Are there any directors of the
14 entity?

15 A. Yes.

16 Q. Who are the directors?

17 A. There are three directors, Nick,
18 Nick Denton, Gaby Darbyshire and Adrian
19 Weinbrecht.

20 Q. Can you spell Adrian Weinbrecht's
21 name?

22 A. A-d-r-i-a-n, W-e-i-n-b-r-e-c-h-t.

23 Q. And Ms. Darbyshire remains a
24 director of this entity even though she's no
25 longer employed by Gawker Media, LLC?

1 S. Kidder

2 A. Yes, currently.

3 Q. When did you become a director of
4 this entity?

5 A. I'm not a director, I'm an officer.

6 Q. I'm sorry. When did you become an
7 officer?

8 A. I don't recall the specific date,
9 but it would have been likely sometime last
10 summer in consultation with my, with my job
11 change.

12 Q. Okay.

13 Do you receive compensation from
14 Gawker Media Group, Inc.?

15 A. No.

16 Q. Do any of the individuals who
17 are -- who you've named who are affiliated
18 with it in any way receive compensation
19 through that entity?

20 A. Can you elaborate on compensation?

21 Q. Does that -- does Gawker Media
22 Group, Inc. pay money to Mr. Denton or
23 Ms. Darbyshire or Ms. Weinbrecht?

24 A. Not in the regular course of
25 business, no.