

EXHIBIT 2

ELECTRONICALLY FILED 1/13/2014 10:23:21 AM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

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

October 1, 2013

10:07 a.m.

Videotaped Deposition of
SCOTT KIDDER, held at the offices of
Esquire Deposition Solutions,
1384 Broadway, New York, New York 10018,
pursuant to Notice, before
Toni Allegrucci, a Notary Public of the
State of New York.

A P P E A R A N C E S:

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ALSO PRESENT:

ANDREW RITCHIE, Videographer

HEATHER L. DIETRICK, Counsel, Gawker Media

1 S. Kidder

2 Q. How does it do so not in any manner
3 other than in the regular course of business?

4 A. The sole purpose of Gawker Media
5 Group Incorporated is to facilitate ownership
6 in Gawker Media, LLC and Kinja Hungarian
7 Corporation, as part of that sometimes
8 Gawker Media Group, Incorporated undertakes
9 stock buybacks in which it will purchase back
10 some of its own stock from any shareholders.

11 Q. Okay. In your last response you
12 identified a Kinja Hungary entity?

13 A. Yes.

14 Q. What entity is that specifically?

15 A. Kinja KFT.

16 Q. What kind of an entity is that?

17 A. Kinja is an intellectual property
18 holding and technology development company.

19 Q. What is the relationship between
20 Kinja KFT and Gawker Media, LLC?

21 A. They are 100 percent fully owned by
22 Gawker Media Group Incorporated and they have
23 entered into various agreements between each
24 other.

25 Q. When was Kinja -- is Kinja KFT a

1 S. Kidder

2 corporation?

3 A. It's a Hungarian corporation.

4 Q. When was it incorporated?

5 A. I don't know the specific date, but
6 it would have been in the early 2000s.

7 Q. Who are the officers of that
8 entity?

9 A. I am -- Scott Kidder is the
10 managing director.

11 Q. Any other officers?

12 A. I'm, I'm not aware of any other
13 officers.

14 Q. Any directors?

15 A. I'm a managing director. I'm not
16 aware of any other directors.

17 Q. You indicated that Kinja KFT --
18 well, let me go back. What is the
19 relationship between Kinja KFT and -- strike
20 that.

21 So Kinja KFT then is in effect a
22 wholly-owned subsidiary of Gawker Media
23 Group, Inc.?

24 A. Yes.

25 Q. Okay. And when you say it holds

1 S. Kidder
2 the -- it's an IP holding and technology
3 company, does that mean that it, for example,
4 holds the trademark rights to Gawker and
5 its -- to any Gawker Media trademarks?

6 A. It owns trademarks and domain names
7 for all of the sites that Gawker Media, LLC
8 currently operates.

9 Q. Do you know whether Kinja KFT has
10 an agent for service process?

11 A. I do not.

12 Q. Does Kinja KFT maintain bank
13 accounts?

14 A. Yes.

15 Q. And where are those located?

16 A. In banks in Hungary and the
17 United States.

18 Q. Same question with respect to
19 Gawker Media Group, Inc., does it maintain
20 bank accounts?

21 A. It has a bank account in the
22 United States.

23 Q. Does it maintain bank accounts in
24 the Cayman Islands as well?

25 A. No.

1 S. Kidder

2 Q. Okay. Does the Gawker.com website
3 hold any copyrights of its own?

4 A. I'm not sure I understand the
5 question.

6 Q. Does -- are copyrights registered
7 under Gawker. -- are any copyrights for
8 content that appears on Gawker.com registered
9 under Gawker.com as opposed to the
10 Gawker Media, LLC?

11 A. I don't believe Gawker.com is an
12 entity.

13 Q. Is Gawker.com listed as an author
14 of any articles that have ever been
15 registered with the copyright office by
16 Gawker Media, LLC?

17 A. I personally am not aware of any
18 articles appearing on Gawker.com that have
19 ever been registered with the copyright
20 office.

21 Q. Okay. In any event, though, Kinja
22 KFT does not today hold any, hold the
23 copyright to any content that has appeared on
24 any Gawker Media websites?

25 A. That's correct.

1 S. Kidder

2 MR. BERLIN: Can I just interject
3 so that there's -- for clarity. I
4 understood the witness to say that the
5 trademarks are owned by Kinja KFT,
6 obviously to the extent that a
7 trademark, for example, in Gawker.com is
8 owned by Kinja KFT that trademark does
9 appear on the Gawker.com website. I
10 don't think that was your question. I
11 think your question was about the
12 stories --

13 MR. MIRELL: Yes, correct.

14 MR. BERLIN: -- and photos and the
15 videos.

16 MR. MIRELL: Correct.

17 MR. BERLIN: But I just want, I
18 don't want there to be -- it's -- I
19 don't think you're trying to
20 intentionally try and trip up the
21 witness --

22 MR. MIRELL: I am not.

23 MR. BERLIN: -- with legal
24 concepts, but I just wanted to make sure
25 we're all on the same page.