

**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 a resident of Los Angeles, California over the age of 18 years. I am an attorney duly licensed to practice before all courts of the State of California, among other courts. I am a partner at the law firm Harder Mirell & Abrams LLP, counsel (admitted *pro hac vice*) for Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan. The statements made herein are based on my personal knowledge.

ELECTRONICALLY FILED 4/4/2014 5:26:02 PM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

2. Attached hereto as **Exhibit A** is a true copy of my February 4, 2014 email correspondence with Alia Smith, counsel for Gawker Media, LLC (“Gawker”).

3. Attached hereto as **Exhibit B** are true copies of excerpts from the deposition transcript of Mr. Bollea’s March 6–7, 2014 deposition.

4. Attached hereto as **Exhibit C** is a true copy of an excerpt from Gawker’s January 4, 2013 Dispositive Motion, noticed for hearing April 23, 2104.

5. Each of the publicly available documents marked at the Gawker deponents’ depositions were collected after the deadline for production of documents responsive to Gawker’s document requests. Specifically, Mr. Bollea produced responsive documents on August 28, 2013. Each of the publicly available documents marked at the Gawker depositions were collected on or after September 26, 2013, which was one month after Mr. Bollea’s production.

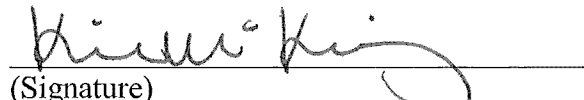
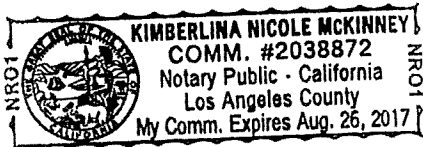
I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Executed this 4th day of April, 2014.



CHARLES J. HARDER

Sworn to and subscribed before me this 4th day of April, 2014 by Charles J. Harder who is personally known to me or _____ who has produced _____ (type of I.D.) as identification (check one).



Kimberlina McKinney
(Type or Print Name)

Notary Public
My Commission Expires: 8/26/2017
Commission No.: 2038872