

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

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

Case No.: 12012447-CI-011

vs.

HEATHER CLEM; GAWKER MEDIA,
LLC aka GAWKER MEDIA; et al.,

Defendants.

**JOINT STIPULATION REGARDING PLAINTIFF'S OBJECTIONS
TO SUBPOENAS DIRECTED TO COX MEDIA GROUP, WORTMAN
WORKS MEDIA & MARKETING, INC., AND JULES WORTMAN POMEROY**

Plaintiff Terry Gene Bollea ("Bollea") and Defendant Gawker Media, LLC ("Gawker") jointly stipulate that Bollea is withdrawing his objections to the Subpoenas Duces Tecum without Deposition that Gawker intends to serve on Cox Media Group ("Cox"), Wortman Works Media & Marketing, Inc. ("Wortman Works"), and Jules Wortman Pomeroy ("Wortman") in light of Gawker's agreement to revise those subpoenas in the manner indicated in this Stipulation.

1. On July 7, 2014, Gawker filed nine Notices of Intent to Serve Subpoenas for Production of Documents without Deposition and corresponding proposed Subpoenas Duces Tecum without Deposition. Included in the proposed subpoenas were subpoenas directed to Cox, Wortman Works, and Wortman.

2. On July 17, 2014, Bollea filed timely objections to all nine of the proposed subpoenas.

3. Counsel for Gawker and counsel for Bollea subsequently conferred over the scope of the proposed subpoenas and were able to reach agreement as to the proposed subpoenas directed to Cox, Wortman Works, and Wortman. Specifically, Bollea agreed to withdraw his objections to the service of those subpoenas provided that Gawker revised the subpoenas in the manner indicated in the attached Exhibits. *See* Ex. A (revised subpoena directed to Cox); Ex. B (revised subpoena directed to Wortman Works); Ex. C (revised subpoena directed to Wortman).

4. Accordingly, Bollea hereby stipulates that he has withdrawn his objections to the subpoenas directed to Cox, Wortman Works, and Wortman and that he has no objection to their being served in the form indicated in the attached Exhibits.

Dated: August 20, 2014

Respectfully submitted,

HARDER MIRELL & ABRAMS LLP

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: _____



By: /s Paul J. Safier

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of August, 2014, I caused a true and correct copy of the foregoing to be served electronically upon the following counsel of record at their respective email addresses via the Florida Courts E-Filing Portal:

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