

**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.

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**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.

2. Attached hereto as **Exhibit A** is a true copy of excerpts from the transcript of the deposition of non-party Bubba Clem, which took place on March 3, 2014.

3. Attached hereto as **Exhibit B** is a true copy of excerpts from the transcript of the discovery hearing held before Judge Campbell on January 17, 2014.

4. Attached hereto as **Exhibits C through I** are true copies of excerpts from the transcript of the deposition of Plaintiff Terry Gene Bollea, which took place over two days on March 6 and 7, 2014. Certain of the transcript excerpts have been designated “CONFIDENTIAL” pursuant to the parties’ Protective Order.

5. Attached hereto as **Exhibit J** is a true copy of documents Bates stamped BOLLEA 001060–BOLLEA 001067, which were obtained from TNA Wrestling and provided to Gawker’s counsel as a courtesy and not in response to any formal request by any party to this litigation.

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

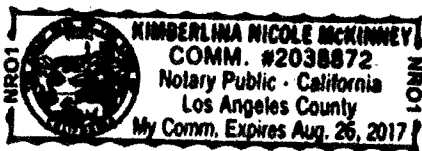
Executed this 17th day of June, 2014.

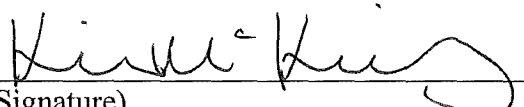
  
CHARLES J. HARDER

State of California  
County of Los Angeles

Subscribed and sworn to (or affirmed) before me, Kimberlina McKinney  
this 17<sup>th</sup> day of June, 2014, by Charles J. Harder who proved to me on the  
basis of satisfactory evidence to be the person who personally appeared before me.

He/she is personally known to me  or he/she has produced \_\_\_\_\_  
(type of I.D.) as identification.



  
(Signature)  
Kimberlina McKinney  
(Type or Print Name)  
Notary Public  
My Commission Expires: Aug 26, 2017  
Commission No.: 2038872