

**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 DOUGLAS E. MIRELL

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

DOUGLAS E. MIRELL, 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 and correct copy of an article entitled “Gawker’s Nick Denton Explains Why Invasion of Privacy is Positive for Society,” published by *The Hollywood Reporter* on May 22, 2013, and available online at <http://www.hollywoodreporter.com/thr-esq/gawkers-nick-denton-explains-why-526548>.

3. Attached hereto as **Exhibit B** is a true and correct copy of the February 26, 2014, Order of Judge Campbell.

4. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from Gawker’s discovery responses, specifically Interrogatories 18 and 19 and Requests for Production of Documents 89, 90, 92, 93, 116 (2nd), 119, 120, 121, and 126.

5. Attached hereto as **Exhibit D** is a true and correct copy of Plaintiff’s July 25, 2014, meet and confer correspondence to Gawker.

6. Attached hereto as **Exhibit E** is a true and correct copy of Gawker’s August 4, 2014, response to Plaintiff’s July 25, 2014, meet and confer correspondence.

7. Attached hereto as **Exhibit F** is a true and correct copy of excerpts from the transcript of the deposition of Scott Kidder, Gawker’s person most knowledgeable about the matters at issue in this lawsuit.

8. Attached hereto as **Exhibit G** is a true and correct copy of preservatons of various webpages from Gawker.com.

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 19 th day of August, 2014.



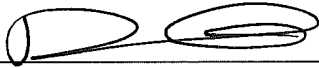
DOUGLAS E. MIRELL

State of California
County of Los Angeles

Subscribed and sworn to (or affirmed) before me, Dana Michelle Ivey, Notary Public
this 19 day of August, 2014, by Douglas E. Minell 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 a CA Drivers License
(type of I.D.) as identification.




(Signature)
Dana Michelle Ivey
(Type or Print Name)
Notary Public
My Commission Expires: May 19, 2015
Commission No.: 1937167