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 Et al.,	
Defendants.	

PLAINTIFF TERRY BOLLEA'S STATEMENT OF NON-OPPOSITION TO GAWKER MEDIA LLC'S REQUEST TO DETERMINE CONFIDENTIALITY

In connection with its exceptions to Judge Case's decision to enforce the Court's February 26, 2014 protective order, Gawker Media, LLC ("Gawker") has asked this Court to determine the confidentiality of documents in which private, confidential matters were discussed by the attorneys in this action. Gawker made this request so that it can present these materials to the Court under seal and rely on them in arguing its exceptions.

While Mr. Bollea strenuously disagrees with Gawker's position on the merits of its exceptions, Mr. Bollea does not oppose Gawker's request that this Court determine the confidentiality of the documents. This Court should do so, and determine that the documents, which were designated as confidential under the parties' stipulated protective order, are, in fact, confidential and may be withheld from the public court file in this matter. This will allow the Court to review the factual background for Gawker's exceptions while protecting materials that concern private matters and were properly designated as confidential under the parties'

protective order.

DATED on March 13, 2015.

/s/ Shane B. Vogt

Kenneth G. Turkel, Esq. Florida Bar No. 867233 Shane B. Vogt Florida Bar No. 0257620 BAJO | CUVA | COHEN | TURKEL 100 North Tampa Street, Suite 1900 Tampa, Florida 33602

Tel: (813) 443-2199 Fax: (813) 443-2193

Email: kturkel@bajocuva.com Email: svogt@bajocuva.com

-and-

Charles J. Harder, Esq.
PHV No. 102333
Douglas E. Mirell, Esq.
PHV No. 109885
Sarah E. Luppen, Esq.
PHV No. 113729
Jennifer J. McGrath, Esq.
PHV No. [pending]
HARDER MIRELL & ABRAMS LLP
1925 Century Park East, Suite 800
Los Angeles, CA 90067
Tel: (424) 203-1600

Tel: (424) 203-1600 Fax: (424) 203-1601

Email: charder@hmafirm.com Email: dmirell@hmafirm.com Email: sluppen@hmafirm.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by e-mail via the e-portal system this 13th day of March, 2015 to the following:

Barry A. Cohen, Esquire
Michael W. Gaines, Esquire
The Cohen Law Group
201 E. Kennedy Blvd., Suite 1950
Tampa, Florida 33602
bcohen@tampalawfirm.com
mgaines@tampalawfirm.com
jhalle@tampalawfirm.com
mwalsh@tampalawfirm.com
Counsel for Heather Clem

David R. Houston, Esquire Law Office of David R. Houston 432 Court Street Reno, NV 89501 dhouston@houstonatlaw.com krosser@houstonatlaw.com

Michael Berry, Esquire Levine Sullivan Koch & Schultz, LLP 1760 Market Street, Suite 1001 Philadelphia, PA 19103 mberry@lskslaw.com Pro Hac Vice Counsel for Gawker Defendants Gregg D. Thomas, Esquire
Rachel E. Fugate, Esquire
Thomas & LoCicero PL
601 S. Boulevard
Tampa, Florida 33606
gthomas@tlolawfirm.com
rfugate@tlolawfirm.com
kbrown@tlolawfirm.com
pmcgonigle@tlolawfirm.com
Counsel for Gawker Defendants

Seth D. Berlin, Esquire
Paul J. Safier, Esquire
Alia L. Smith, Esquire
Michael D. Sullivan, Esquire
Levine Sullivan Koch & Schulz, LLP
1899 L. Street, NW, Suite 200
Washington, DC 20036
sberlin@lskslaw.com
psafier@lskslaw.com
asmith@lskslaw.com
msullivan@lskslaw.com
Pro Hac Vice Counsel for
Gawker Defendants

/s/ Shane B. Vogt Shane B. Vogt