

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. 12012447CI-011

vs.

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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**PLAINTIFF TERRY BOLLEA'S RESPONSE TO MOTION FOR STAY PENDING  
APPEAL AND STIPULATION FOR AMENDMENT OF OCTOBER 21, 2015 ORDER  
PERMITTING LIMITED DISCOVERY ON POTENTIAL VIOLATION OF  
PROTECTIVE ORDER AND APPOINTING ELECTRONIC FORENSIC EXPERT**

Plaintiff, Terry Bollea known professionally as Hulk Hogan ("Mr. Bollea"), hereby responds to the Motion for Stay Pending Appeal filed by Gawker Defendants on October 27, 2015, and hereby stipulates and moves the Court for an amendment of its October 21, 2015 Order Permitting Limited Discovery On Potential Violation Of Protective Order And Appointing Electronic Forensic Expert (the "Order"), and states as follows:

1. On October 21, 2015, the Court entered its Order.

2. On October 27, 2015, Gawker Defendants filed their Motion for Stay Pending Appeal of the Order (the “Motion”). In paragraph 10 of their Motion, Gawker Defendants identify what they contend are several “legal defects” in the Order.

3. Without conceding the merits of the Motion, and with full reservation of all rights and objections, Mr. Bollea hereby stipulates and moves the Court to amend the Order, in the form attached hereto as **Exhibit A** (a redlined version of the Order, with Mr. Bollea’s proposed revisions.)

4. A clean copy of the proposed Amended Order will be provided to the Court electronically along with a courtesy copy of this filing.

5. Among other things, Mr. Bollea’s proposed Amended Order: clarifies that the Inspection ordered is not a “wholesale” inspection of Gawker Defendants’ computers, servers, phones and electronic devices; and broadens the grounds upon which Gawker Defendants may object to production of the results of the Inspection.

6. Mr. Bollea believes the foregoing amendments to the Order will help further prevent any alleged irreparable harm to Gawker Defendants.

*/s/ Kenneth G. Turkel*

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**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 27th day of October, 2015 to the following:

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