

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.

**PLAINTIFF TERRY BOLLEA'S STATEMENT OF LIMITED NON-OPPOSITION TO
GAWKER DEFENDANTS' MOTION TO BIFURCATE (STYLED "Publisher
Defendants' Motion to Bifurcate Liability And Compensatory Damages from Punitive
Damages At Trial")**

Mr. Bollea does not oppose Gawker Defendants' request to bifurcate the punitive damages portion of the trial unless and until there is a determination by the jury that Gawker Defendants are liable for punitive damages. Mr. Bollea does not, however, endorse or concede any of the factual or legal claims in Gawker Defendants' motion *in limine*, and reserves all objections and arguments concerning the same. Moreover, Mr. Bollea does not concede that the bifurcation of the punitive damages portion of the trial renders the financial condition of Gawker Defendants irrelevant or inadmissible during the liability phase of trial.

Respectfully submitted,

/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 25th day of June, 2015 to the following:

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