

# **EXHIBIT A**

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, et al.,

Defendants.

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**STIPULATION AND [PROPOSED] JUDGMENT FOR INJUNCTION ONLY**

Plaintiff Terry Bollea, professional known as Hulk Hogan ("Bollea"), and defendant Heather Cole, formerly known as Heather Clem ("Cole"), by and through their respective counsel of record, hereby stipulate to the following judgment for injunction (only), pursuant to the Settlement Agreement between these parties:

1. Cole is hereby under a legal obligation to promptly provide to Bollea and/or his counsel of record herein, any and all information, documents and materials (including without limitation any video and/or audio content or still images depicting in any way nudity or sexual activity of Bollea (collectively herein, "Content"); the whereabouts of any such Content, and the names and contact information of any persons who were or might have been involved in the delivery of such Content to third parties, including media organizations), that Cole may acquire after the date of entry of this Judgment.


2. Cole shall not undertake any activity to distribute, transfer, release, publish, post, or exploit any Content or information, documents or materials relating to Content.

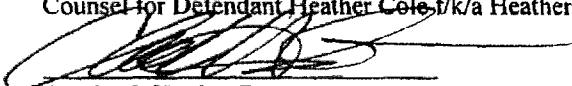
3. The Court shall retain jurisdiction over Bollea and Cole for a period of two (2) years from the date of entry of this Judgment, to enforce this Judgment.

DONE AND ORDERED in Chambers at Pinellas County, Florida this \_\_\_\_ day of \_\_\_\_\_, 2015.

\_\_\_\_\_  
Pamela A.M. Campbell  
Circuit Court Judge

So stipulated.

  
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Copies furnished to:  
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