

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.

GAWKER MEDIA, LLC
aka GAWKER MEDIA;
NICK DENTON; and
A. J. DAULERIO,

Defendants.

**PLAINTIFF TERRY BOLLEA'S STIPULATION AND MOTION TO AMEND/MODIFY
OCTOBER 27, 2015 ORDER ON MOTIONS TO DETERMINE CONFIDENTIALITY**

Plaintiff, Terry Bollea known professionally as Hulk Hogan ("Mr. Bollea"), hereby stipulates and moves the Court for an amendment or modification of its October 27, 2015 Order on Motions to Determine Confidentiality (the "Order"), and states as follows:

1. On July 1, 2015 and October 1, 2015, the Court heard argument on over twenty Motions to Determine Confidentiality filed by the parties throughout this case, as well as motions by intervening media organizations seeking public access to court records and transcripts (the "Confidentiality Motions"). Gawker Defendants called these motions up for hearing by notices dated August 20, 2015 and September 24, 2015.

2. The Confidentiality Motions were filed in conjunction with various substantive motions in the case which each contain multiple exhibits. In many instances, Mr. Bollea opposed the Confidentiality Motions because confidential and private information unrelated to

the case is contained within the underlying substantive motions as well as exhibits to motions, responses or replies, as well as in affidavits or declarations related thereto.

3. On October 27, 2015, the Court entered its Order, the form of which was agreed upon by the parties.

4. Gawker Defendants' counsel have since indicated to Mr. Bollea's counsel that they intend to appeal several of the Court's recent rulings, possibly including the October 27, 2015 Order.

5. Since the October 1, 2015 hearing, Mr. Bollea has re-reviewed¹ each of the Confidentiality Motions addressed in the October 27, 2015 Order, as well as the exhibits thereto, in an effort to determine whether any of the records at issue in the October 27, 2015 Order can be unsealed. In particular, Mr. Bollea reviewed and determined that he does not oppose the unsealing of several exhibits to confidential filings, as long as these exhibits are unsealed **without** unsealing the confidential filings themselves.

6. With full reservation of his rights and objections concerning the merits all of the Confidentiality Motions, Mr. Bollea hereby stipulates and moves the Court to amend or modify the October 27, 2015 Order, in the form attached hereto as **Exhibit A**.

/s/ Kenneth G. Turkel
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¹ Mr. Bollea's counsel endeavored to complete this process before the October 27, 2015 Order was entered, but was unable to do so due to the volume of the materials at issue and other time constraints.

-and-

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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 6th day of November, 2015 to the following:

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