

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.: 12012447-CI-011

GAWKER MEDIA, LLC
aka GAWKER MEDIA; et al.,

Defendants.

**STIPULATION REGARDING PLAINTIFF'S
MOTION TO STRIKE AFFIRMATIVE DEFENSES**

Plaintiff Terry Bollea, professionally known as Hulk Hogan, and Defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio (hereinafter, "Gawker Defendants"), jointly stipulate as follows:

1. On July 17, 2015, Gawker Defendants filed Amended Answers pleading affirmative defenses that Plaintiff's claims allegedly are barred by (a) Florida Statutes § 768.295 as amended (hereinafter, the "anti-SLAPP statute") and (b) as a result of an alleged ongoing pattern of fraud on the court. *See* Gawker Defendants' Amended Answers, Defenses ¶¶ 22, 23.

2. On October 30, 2015, Plaintiff filed a Motion to Strike Affirmative Defenses seeking to strike those purported defenses from Gawker Defendants' Amended Answers.

3. Gawker Defendants hereby withdraw Paragraphs 22 and 23 of the Defenses listed in their Amended Answers, and Plaintiff hereby withdraws his Motion to Strike Affirmative Defenses.

4. This Stipulation does not affect the alleged merits of, or any arguments concerning, any issues relating to the anti-SLAPP statute or any claims alleging "fraud on the court," including without limitation Gawker Defendants' ability to bring motions relating to

same and does not affect Plaintiff's ability to raise any arguments in opposition to any such motion(s).

Dated: November 13, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of November, 2015, I caused a true and correct copy of the foregoing to be served via the Florida Courts' E-Filing Portal on the following counsel of record:

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