

**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; NICK DENTON; A.J.
DAULERIO,

Defendants.

NOTICE OF CONFIDENTIAL INFORMATION WITHIN COURT FILING

Pursuant to Florida Rule of Judicial Administration 2.420(d)(2), Plaintiff, Terry Gene Bollea, by and through his undersigned counsel, hereby certifies that filed herewith are documents containing confidential information as described in Rule 2.420(c)(9), specifically, the following materials in support of Bollea's Emergency Motion to Vacate and/or Modify June 10, 2016 Oral Ruling on Motion for Stay of Execution Pending Appeal, for Rehearing and Reconsideration, for Sanctions and/or Order to Show Cause, and for Award of Attorneys' Fees and Costs Against Defendants Denton and Daulerio:

The confidential information within the documents is located in:

- 1) The Deposition transcript of Nick Denton taken July 6, 2016 taken in the United States Bankruptcy Court, Southern District of New York, In re: Gawker Media, LLC, Case No. 16-11700 and in Gawker Media, LLC v. Meanith Huon, et al, Adv. Proc. No. 16-ap-1085;**
- 2) The Deposition transcript of Heather Dietrick taken July 6, 2016 taken in the United States Bankruptcy Court, Southern District of New York, In re: Gawker**

Media, LLC, Case No. 16-11700 and in Gawker Media, LLC v. Meanith Huon, et al, Adv. Proc. No. 16-ap-1085;

- 3) **The Deposition transcript of William Holden taken July 6, 2016 taken in the United States Bankruptcy Court, Southern District of New York, In re: Gawker Media, LLC, Case No. 16-11700 and in Gawker Media, LLC v. Meanith Huon, et al, Adv. Proc. No. 16-ap-1085; and**
- 4) **The Indemnity Agreement between Gawker Media Group, Inc. and Nicholas Denton dated December 31, 2009.**

Plaintiff filed this Notice to comply with the e-filing procedures. He also has contemporaneously filed a Motion to Determine the Confidentiality of Court Records consistent with Rule 2.420(d)(3), because Rule 2.420(c)(9) governs the type of confidential information at issue.

Dated: July 25, 2016.

Respectfully submitted,

/s/ Kenneth G. Turkel

Kenneth G. Turkel, Esq.
Florida Bar No. 867233
Shane B. Vogt
Florida Bar No. 0257620
BAJO | CUVA | COHEN | TURKEL
100 North Tampa Street, Suite 1900
Tampa, Florida 33602
Tel: (813) 443-2199
Fax: (813) 443-2193
Email: kturkel@bajocuva.com
Email: svogt@bajocuva.com

-and-

Charles J. Harder, Esq.
PHV No. 102333
Douglas E. Mirell, Esq.
PHV No. 109885
HARDER MIRELL & ABRAMS LLP

132 South Rodeo Drive, Suite 301
Beverly Hills, CA 90212-2406
Tel: (424) 203-1600
Fax: (424) 203-1601
Email: charder@hmafirm.com
Email: dmirell@hmafirm.com
Email: jmcgrath@hmafirm.com
Attorneys for Plaintiff

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 this day of July, 2016 to the following:

Barry A. Cohen, Esquire
The Cohen Law Group
201 E. Kennedy Blvd., Suite 1950
Tampa, Florida 33602
bcohen@tampalawfirm.com
jhalle@tampalawfirm.com
mwalsh@tampalawfirm.com
Counsel for Heather Clem

Gregg D. Thomas, Esquire
Rachel E. Fugate, Esquire
Thomas & LoCicero PL
601 S. Boulevard
Tampa, Florida 33606
gthomas@tlolawfirm.com
rfugate@tlolawfirm.com
kbrown@tlolawfirm.com
abeene@tlolawfirm.com
Counsel for Gawker Defendants

David R. Houston, Esquire
Law Office of David R. Houston
432 Court Street
Reno, NV 89501
dhouston@houstonatlaw.com
krosser@houstonatlaw.com

Seth D. Berlin, Esquire
Paul J. Safier, Esquire
Alia L. Smith, Esquire
Michael D. Sullivan, Esquire
Levine Sullivan Koch & Schulz, LLP
1899 L. Street, NW, Suite 200
Washington, DC 20036
sberlin@lskslaw.com
psafier@lskslaw.com
asmith@lskslaw.com
msullivan@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

Michael Berry, Esquire
Levine Sullivan Koch & Schultz, LLP
1760 Market Street, Suite 1001
Philadelphia, PA 19103
mberry@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

Timothy J. Conner
Holland & Knight LLP
50 North Laura Street, Suite 3900
Jacksonville, FL 32202
timothy.conner@hklaw.com

Allison M. Steele
Rahdert, Steele, Reynolds & Driscoll, P.L.
535 Central Avenue
St. Petersburg, FL 33701
amnestee@aol.com
asteelc@rahdertlaw.com

Charles D. Tobin
Holland & Knight LLP
800 17th Street N.W., Suite 1100
Washington, D.C. 20006
charles.tobin@hklaw.com
*Attorneys for Intervenors, First Look Media, Inc.,
WFTS-TV and WPTV-TV, Scripps Media, Inc.,
WFTX-TV, Journal Broadcast Group, Vox Media,
Inc., WFLA-TV, Media General Operations, Inc.,
Cable News Network, Inc., BuzzFeed and The
Associated Press.*

Stuart C. Markman, Esquire
Kristin A. Norse, Esquire
Kynes, Markman & Felman, P.A.
Post Office Box 3396
Tampa, Florida 33601
Tel: (813) 229-1118
smarkman@kmf-law.com
knorse@kmf-law.com
plawhead@kmf-law.com
Appellate Co-Counsel for Plaintiff

ncampbell@rahdertlaw.com
*Attorneys for Intervenor Times Publishing
Company*

Steven L. Brannock, Esquire
Celene H. Humphries, Esquire
Brannock & Humphries
1111 West Cass Street, Suite 200
Tampa, FL 33606
sbrannock@bhappeals.com
chumphries@bhappeals.com
eservice@bhappeals.com
Co-Counsel for Gawker Defendants

/s/ Kenneth G. Turkel

Attorney