## Exhibit 6

#### In The Matter Of:

# v. HEATHER CLEM

### DAULERIO, III, ALBERT JAMES - Vol. 1 June 17, 2015

\_\_\_\_\_

#### **CONFIDENTIAL**

#### MERRILL CORPORATION

LegaLink, Inc.

20750 Ventura Boulevard Suite 205 Woodland Hills, CA 91364 Phone: 818.593.2300 Fax: 818.593.2301 Case No. -against- 12012447 CI-011

HEATHER CLEM, GAWKER MEDIA, LLC AKA GAWKER MEDIA; GAWKER MEDIA GROUP, INC. AKA GAWKER MEDIA; et al.,

Defendants.
----x
CONFIDENTIAL

June 17, 2015 10:15 a.m.

Videotaped Deposition of

ALBERT JAMES DAULERIO, III, taken by Plaintiff,

pursuant to Notice, at the offices of DTI Global,

1345 Avenue of the Americas, New York, New York,

before TAMMEY M. PASTOR, a Registered

Professional Reporter, Certified LiveNote

Reporter and Notary Public within and for the

State of New York.

Page 2

```
1
    APPEARANCES:
 2
           HARDER MIRELL & ABRAMS LLP
           Attorneys for Plaintiff
 3
                 1925 Century Park East, Suite 800
                 Los Angeles, CA 90067
 4
          BY: JENNIFER J. McGRATH, ESQ.
 5
                 (Jmcgrath@hmafirm.com)
 6
 7
          LEVINE SULLIVAN KOCH & SCHULZ, LLP
          Attorneys for Defendants
 8
                 1899 L. Street, NW
                 Washington, DC 20036
 9
                 ALIA L. SMITH, ESQ.
           BY:
10
                 (Asmith@lskslaw.com)
                       -AND-
11
                 SETH D. BERLIN, ESQ.
                 (sberlin@lsks.com)
12
13
    ALSO PRESENT:
14
    ROBERT GIBBS, Videographer
15
     HEATHER L. DIETRICK, President and General
16
    Counsel, Gawker Media
17
18
19
20
21
22
23
24
25
```

## CONFIDENTIAL ALBERT JAMES DAULERIO, III - 6/17/2015

Page 136

1	Α.	No.	13:15:49
2	Q.	Are you the beneficiary of any	13:15:52
3	trust?		13:15:53
4	Α.	No.	13:15:53
5	Q.	Have you ever set up any trust?	13:15:55
6	Α.	No.	13:15:57
7	Q.	So you've never put any	13:16:00
8	property of	any kind into a trust?	13:16:02
9	Α.	No.	13:16:03
10	Q.	Are you paying your legal fees	13:16:03
11	in connection	on with this litigation?	13:16:11
12	Α.	No.	13:16:13
13		MS. SMITH: Objection.	13:16:13
14	Α.	No.	13:16:16
15	Q.	Are your legal fees being paid	13:16:17
16	by a Gawker entity in connection with this		
17	litigation?		13:16:21
18		MS. SMITH: Objection.	13:16:22
19	Α.	As far as I can tell, yes.	13:16:22
20	Q.	Okay. Have you ever been told	13:16:26
21	on I am r	not asking for the substance of	13:16:28
22	any conversa	ations, but I'm asking whether	13:16:30
23	you have eve	er been told you would need to	13:16:32
24	repay any of	the legal fees that have been	13:16:34
25	expended on	your behalf in this litigation?	13:16:37
			I

## CONFIDENTIAL ALBERT JAMES DAULERIO, III - 6/17/2015

Page 137

1	** DIRECTION NOT TO ANSWER **	13:16:37
2	MS. SMITH: Objection. I don't	13:16:39
3	think that question can be answered	13:16:39
4	without revealing attorney-client	13:16:41
5	communications. I am instructing the	13:16:44
6	witness not to answer.	13:16:46
7	A. I haven't been told that, no.	13:16:47
8	Q. Without reference to any	13:16:49
9	conversations with counsel, are there any	13:16:50
10	other discussions you've had with anyone	13:16:53
11	about you being having to repay any of	13:16:55
12	the legal fees that have been expended on	13:16:59
13	your behalf in this litigation?	13:17:01
14	A. No.	13:17:03
15	MS. McGRATH: I am going to mark	13:17:17
16	as Exhibit 399 a document which has	13:17:18
17	previously been Bates labeled as AJD	13:17:24
18	070.	13:17:32
19	(Deposition Exhibit 399	13:17:32
20	for identification, Loan Details,	13:17:32
21	production numbers AJD 070.)	13:17:26
22	BY MS. McGRATH:	13:17:43
23	Q. Mr. Daulerio, I will represent	13:17:43
24	to you this was produced to Plaintiff in	13:17:45
25	this matter. Do you recognize this document?	13:17:46
l		I

## CONFIDENTIAL ALBERT JAMES DAULERIO, III - 6/17/2015

Page 147

1	CERTIFICATE
2	STATE OF NEW YORK )
3	: ss. COUNTY OF NEW YORK )
4	I, TAMMEY M. PASTOR, a Registered
5	Professional Reporter, Certified LiveNote
6	Reporter and Notary Public within and for the
7	State of New York, do hereby certify:
8	That ALBERT JAMES DAULERIO, III,
9	the witness whose deposition is hereinbefore
10	set forth, was duly sworn by me and that such
11	deposition is a true record of the testimony
12	given by the witness.
13	I further certify that I am not
14	related to any of the parties to this action
15	by blood or marriage, and that I am in no way
16	interested in the outcome of this matter.
17	IN WITNESS WHEREOF, I have hereunto
18	set my hand this $194$ day of $700$ , 2015.
19	
20	
21	Company of the Compan
22	Vanny M bastor
23	TAMMEY M. PASTOR, RPR, CLR
24	
25	

Merrill Corporation

800-826-0277