

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

GAWKER MEDIA, LLC,, *et al.*,

Defendants.

MOTION TO DETERMINE CONFIDENTIALITY OF COURT RECORDS

Pursuant to Rule 2.420 of the Florida Rules of Judicial Administration and this Court's Agreed Protective Order Governing Confidentiality dated July 25, 2013 (the "Confidentiality Order"), Defendant A.J. Daulerio, by and through undersigned counsel, hereby moves to determine the confidentiality of an Exhibit to his Affidavit filed along with his Response to the Notice to Appear and Order to Show Cause ("Response"). As grounds for this motion, Defendant states as follows:

1. Florida Rule of Judicial Administration 2.420(c)(9)(A)(iv) provides that certain court records are confidential if the Court determines that confidentiality is required in order to "obtain evidence to determine legal issues in a case."
2. This Court's Confidentiality Order provides that both the parties and non-party witnesses may designate testimony and/or documents as "confidential" if their substance falls into certain enumerated categories.
3. The document attached as Exhibit 3 to his Affidavit has been marked "Confidential" in discovery pursuant to that Order.

4. Counsel for Defendant certifies that this motion is made in good faith and is supported by a sound factual and legal basis.

WHEREFORE, Defendant respectfully requests that this Court determine the confidentiality of Exhibit 3 attached to the Affidavit.

Dated: August 9, 2016

Respectfully submitted,
THOMAS & LOCICERO PL

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Counsel for Defendant A.J. Daulerio

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of August, 2016, 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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