

**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.

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"), Plaintiff, Terry Bollea, by and through his undersigned counsel, hereby moves to determine the confidentiality of certain information and exhibits designated as "confidential" which are redacted in and being filed in support of Plaintiff's Objection to Daulerio's Claim of Exemptions. As grounds for this motion, Plaintiff states as follows:

1. Florida Rule of Judicial Administration 2.420 provides that certain court records are confidential if the Court determines that confidentiality is required.
2. Concurrent with this Motion, Plaintiff is filing his Objection to Daulerio's Claim of Exemptions.
3. The deposition transcript of A. J. Daulerio, taken August 17, 2016, has been designated "Confidential," in its entirety.
4. Exhibits 1, 2, 5 and 6 to the deposition of A.J. Daulerio, taken August 17, 2016 also have been designated "Confidential."

5. Counsel for Plaintiff certifies that this motion is made in good faith and is supported by a sound factual and legal basis. Without in any way conceding that any item attached to this Motion has been properly designated as “Confidential” by Mr. Daulerio, Plaintiff is filing this motion in compliance with Rule 2.420 and this Court’s Confidentiality Order.

WHEREFORE, Plaintiff respectfully requests that this Court determine the confidentiality of the Deposition Testimony and Exhibits of A.J. Daulerio taken in aid of execution, including to treat as confidential only that testimony and those documents that are properly treated as such under Rule 2.420 and this Court’s Confidentiality Order.

Dated: August 26, 2016

Respectfully submitted,

/s/ Kenneth G. Turkel

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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 26th day of August, 2016 to the following:

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