

EXHIBIT C
to Motion for Supplemental Relief on Proceedings Supplementary

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

Case No.: 12012447-CI-011

vs.

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

Defendants.

AFFIDAVIT OF A.J. DAULERIO

I, A.J. Daulerio, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information and belief.

1. I provide this affidavit in connection with the Notice and Order served by this Court on August 1, 2016 and pursuant to Fla. Stat. § 56.29(2).

2. My assets are:

a. A 44.7% ownership interest in RGFree, Inc. (“RGFree”), a privately-held start-up media company that I founded and incorporated in Delaware in 2014. RGFree has never earned any revenue or made any profit, and is not currently operational. As a result, it is my understanding that my shares in RGFree have no value.

b. 9,000 shares in Gawker Media Group, Inc. (“GMGI”), a Cayman Islands company, which I am told is a 0.0059% ownership interest in the company.¹ I

¹ I have not worked at Gawker since 2013, and I did not know how many shares I had. When I previously asked the company how many shares I had, I was told I had 5,900 shares and included that number in my prior affidavit. I am now told that I have 9,000 shares and that the earlier information was incomplete. I apologize for the error, but want to set the record straight.

understand that GMGI, and its two subsidiaries, have filed for bankruptcy and are currently up for auction in connection with that bankruptcy. I am not (and have never been) an officer, director or employee of GMGI. I have no personal knowledge of it or its subsidiaries' decision to file for bankruptcy or the bankruptcy case other than what has been publicly reported. I do not know what my shares in GMGI are worth and will not know until after the bankruptcy sale process is completed.

c. A checking account holding \$1,505.78 (a screenshot of my August 8, 2016 bank balance is attached as Exhibit 1). Because I do not currently have full-time employment, I have used money from this account for the past few months solely to pay for basic living expenses, including (a) a short-term rental through September, for which I had to pre-pay my rent, security deposit and most of my utilities; (b) ordinary bills such as food, clothing, transportation, telephone service, health care costs (including health insurance premiums), and other basic necessities; (c) required payments on credit card and student loan debt; and (d) expenditures associated with trying to secure new employment, including travel expenses. On August 8, I received a notice from my bank, attached as Exhibit 2, stating that it had placed a hold on my account because it had received a court order. Not being able to use the very limited funds in this account is a real hardship.

d. In addition to the money in this account, I also have some personal effects such as clothing, furniture, and the like.

3. I do not own a home or a car. I am not claiming or receiving the benefits of a "homestead exemption" under Article X, Section 4 of the Florida Constitution.

4. I understand that Mr. Bollea contends in this proceeding that I also have “indemnity rights and/or choses in action against Gawker Media, LLC and Gawker Media Group, Inc.” (Pl.’s *Ex Parte* Mot.).

a. There is an indemnification provision in my employment agreement, a copy of which is attached as Exhibit 3. I understand that Gawker produced this agreement to Mr. Bollea’s lawyers in July 2013.

b. Until Gawker filed for bankruptcy, it was paying for the attorneys who represent me in this case (as I explained at my deposition when asked about this).

c. I have been advised that Mr. Bollea is objecting in the bankruptcy case to Gawker’s continuing to pay for my attorneys in this case and to Gawker’s indemnifying me for the judgment.

d. Although this was not previously an issue (since Gawker was paying for my defense), I am now trying to get separate counsel to advise me because I understand that my lawyers in this case cannot advise me about indemnification by Gawker since they also represent the company. I have been having trouble finding my own lawyer to advise me because I do not have enough money to pay for one.

5. My liabilities are: the \$115,100,000 judgment against me in this case, \$26,378.70 in student loan debt and \$8,657.45 in credit card debt.

DATED: August 8, 2016



A.J. Daulerio

EXHIBIT 1

to the

AFFIDAVIT OF A.J. DAULERIO

[My Accounts](#) > [Account Activity](#)

Account Activity

[Print](#) [Help with this page](#)

What can we do better?

WE'RE LISTENING

I'd like to...

- ▶ [Pay bills](#)
- ▶ [See statements](#)
- ▶ [See account notices](#)
- ▶ [See more choices](#)



[Enroll and Official Rules >>](#)

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Activity for ...

Show

TOTAL CHECKING (REDACTED) [Show](#)

Details for TOTAL CHECKING (REDACTED)

Present Balance	\$1,505.78	Uncollected funds - Total	\$0.00
Available Balance	\$1,505.78		

EXHIBIT 2

to the

AFFIDAVIT OF A.J. DAULERIO

From: REDACTED
Date: Monday, August 8, 2016
Subject: We placed a legally-ordered hold on your account(s)
To: REDACTED

We placed a legally-ordered hold on your account(s)

Dear ALBERT J DAULERIO,

We placed a hold on your account(s) to comply with a CourtOrder we received on 08-Aug-16. Unfortunately, you can't use money that has a hold on it.

The following funds being held may be greater or less than the actual amount of money in your account(s).

Received Date	Account Number Ending In	Amount of Hold	Case Number
08-Aug-16	REDACTED	\$230,200,000.00	COAL-03Aug16-2237

Here's what you can expect next

* We will send you a copy of the legal order along with confirmation of the account(s) involved.

* We may also charge you a \$0.00 Legal Processing Fee for handling this hold.

To get more information about the CourtOrder, please call FL - PINELLAS COUNTY CLERK OF COURT directly at (727)464-7000.

If you need more information or have any questions, please call us at 1-866-578-7022 Monday through Friday from 8 a.m. to 10 p.m., Saturday from 8 a.m. to 8 p.m. and Sunday from 9 a.m. to 5 p.m., Eastern Time.

Sincerely,

Steven J. Criswell

Steven J. Criswell
Executive Director
Chase Customer Service

**E-mail Security
Information**

E-mail intended for: ALBERT J DAULERIO for account ending in: ^{REDACTED}.

ABOUT THIS MESSAGE

This service email gives you updates and information about your Chase relationship. This email was sent from an unmonitored mailbox. Go to chase.com/CustomerService for options on how to contact us.

Your privacy is important to us. See our online [Security Center](#) to learn how to protect your information.

Chase Privacy Operations, P.O. Box 659752, San Antonio, TX 78265-9752
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LC-COALPHEM0912



Aplicamos una retención sobre sus cuentas en cumplimiento de una solicitud legal

Estimado(a) ALBERT J DAULERIO:

Aplicamos una retención sobre sus cuentas para cumplir con CourtOrder que recibimos el 08-Aug-16. Lamentablemente, usted no puede usar el dinero retenido.

La cantidad de los siguientes fondos retenidos puede ser mayor o menor que la cantidad real de dinero que hay en sus cuentas.

Fecha de recepción	Número de cuenta que termina en	Cantidad de la retención	Número de caso
08-Aug-16	REDACTED	\$230,200,000.00	COAL-03Aug16-2237

Esto es lo que puede esperar a continuación

* Le enviaremos una copia de la orden legal junto con la confirmación e las cuentas involucradas.

* También podremos cobrarle un cargo por procedimiento legal de \$0.00 en concepto de manejo de esta retención/span>

Para obtener más información sobre CourtOrder, comuníquese con FL - PINELLAS COUNTY CLERK OF COURT directamente al (727)464-7000.

Si necesita más información tiene alguna pregunta, comuníquese con nosotros al 1-866-578-7022 de lunes a viernes, de 8:00 a.m. a 10:00 p.m., los sábados de 8:00 a.m. a 8:00 p.m. y los domingos de 9:00 a.m. a 5:00 p.m., hora del Este.

Atentamente,

Steven J. Criswell

Steven J. Criswell
Director Ejecutivo
Servicio al Cliente de Chase

**Información de seguridad
por correo electrónico**

Este es un mensaje de email para: ALBERT J DAULERIO para la cuenta que termina en: ^{REDACTED}.

ACERCA DE ESTE MENSAJE

Este correo electrónico de servicio le proporciona actualizaciones e información sobre su relación con Chase.

Se envió este correo electrónico desde un buzón que no tiene supervisión. Vaya a www.chase.com/Contactanos para revisar las opciones de cómo comunicarse con nosotros.

Su privacidad es importante para nosotros. Consulte nuestro [centro de seguridad](#) por Internet para aprender la forma en que puede proteger su información.

Chase Privacy Operations, P.O Box 659752, San Antonio, TX 78265-9752.
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