

**EXHIBIT B**

Motion for Final Judgment on Writ of Garnishment

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,

and

JP MORGAN CHASE BANK, N.A.,

Garnishee.

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**DEFENDANT A.J. DAULERIO'S  
CLAIM OF EXEMPTION**

Pursuant to Fla. Stat. § 77.041, and in response to this Court's August 2, 2016 order directing the Clerk of the Court to issue a writ of garnishment on JP Morgan Chase Bank, N.A. as garnishee (the "Garnishee"),<sup>1</sup> I, A.J. Daulerio, claim that my account at JP Morgan Chase Bank, N.A. (the "Account") is exempt from garnishment.

The Account—containing \$1,505.78 and currently frozen as a result of the writ of garnishment served on the Garnishee—is exempt from garnishment under Fla. Const. Art. X, § 4(a)(2) and Fla. Stat. § 222.25(4), which together exempt up to \$5,000 in personal property. I

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<sup>1</sup> I received notice of service of the writ of garnishment on August 4, 2016.

am not claiming or receiving the benefit of a homestead exemption. I moved to Florida in May of 2016 and leased an apartment. Prior to moving to Florida, I lived in New York State for approximately six years and still have my New York driver's license. I explained to Plaintiff's counsel during the deposition in aid of execution taken on August 17, 2016 that I intend to move to California imminently to pursue a job opportunity.<sup>2</sup>

If for any reason Florida law does not apply, then I claim that \$1,000 of the Account is exempt under New York law. *See* N.Y. C.P.L.R. § 5205(a)(9) (providing that "one thousand dollars in personal property, bank account or cash" is exempt from application to the satisfaction of money judgments "if no homestead exemption is claimed").

I do not request a hearing to decide the validity of this claim. If Plaintiff objects to this Claim of Exemption and requests a hearing, a copy of Plaintiff's objection and notice of hearing on same should be given to me courtesy of Levine Sullivan Koch & Schulz, LLP, Attn: Michael Berry, 1760 Market Street, Suite 1001, Philadelphia, PA 19103.

The statements made in this Claim of Exemption are true to the best of my knowledge and belief.

08/23/16  
Date

A.J. Daulerio  
A.J. Daulerio

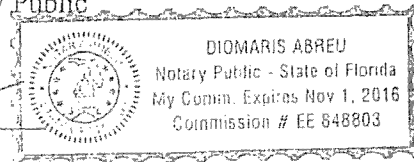
STATE OF Florida

COUNTY OF Palm Beach

SWORN TO AND SUBSCRIBED before me by A.J. Daulerio this 23 day of August, 2016.

<sup>2</sup> *See* Exhibit A (correspondence from my counsel notifying plaintiff's counsel of my upcoming move and addressing my personal property in Florida).

Notary Public



Personally Known \_\_\_\_\_ OR Produced Identification \_\_\_\_\_

Type of Identification Produced Ag; DL

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 23<sup>rd</sup> day of August 2016, I caused a true and correct copy of the foregoing to be served via the Florida Courts' E-Filing Portal upon the following counsel of record, and to be furnished via hand-delivery on the Garnishee and on Plaintiff's counsel at Bajo Cuva Cohen & Turkel, P.A.:

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*Garnishee*

/s/ Gregg D. Thomas  
Attorney

# EXHIBIT A



LEVINE SULLIVAN  
KOCH & SCHULZ, LLP

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August 23, 2016

**VIA EMAIL**

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**Re: *Bollea v. Gawker Media, LLC et al.***  
**Case No. 12012447 CI-011**

Dear Counsel:

We write to advise you that, as Mr. Daulerio explained in his deposition last week, he intends to move to California, where he will begin a new job. He will be moving later this week. When Mr. Daulerio establishes a residence in California and begins employment, we will let you know the details.

We also wish to advise you that Mr. Daulerio intends to take the following personal items with him to California: his computer, his phone, and a limited amount of clothing. Would you like him to ship the other personal items he has in Florida – such as his rice cooker, dishes, books, and remaining clothing – to you? Or, would it be easier to ship those items directly to Mr. Bollea or Mr. Thiel? If it is acceptable to Mr. Bollea and his benefactor Mr. Thiel, Mr. Daulerio would prefer to take those items with him to California, but did not want to run afoul of their desires.



LEVINE SULLIVAN  
KOCH & SCHULZ, LLP

Plaintiff's Counsel

August 23, 2016

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In addition, Mr. Daulerio is hopeful that he will receive his full \$500 security deposit back from his landlord when he moves. Should he endorse the check over to the Bajo Cuva firm, or to Mr. Bollea? What about any prepaid rent that is returned to him? Please advise.

Finally, in reviewing the transcript from the deposition, Mr. Daulerio realized that he forgot to mention he has a golf club (a driver) with him in Florida. While it is likely too small for Mr. Bollea, it might be the right size for one of his friends. Please advise if you would like Mr. Daulerio to include the club in the items he plans to turn over, and, if so, to whom it should be sent.

Please respond within twenty-four hours as to how your client(s) would like Mr. Daulerio to proceed on these open collection issues. Thank you.

Sincerely,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: 

Michael Berry  
Paul Safier