

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

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Case No. 12012447 CI-011

Plaintiff,

vs.

GAWKER MEDIA, LLC aka GAWKER
MEDIA; NICK DENTON; A.J.
DAULERIO,

Defendants.

NOTICE OF CONFIDENTIAL INFORMATION WITHIN COURT FILING

Pursuant to Florida Rule of Judicial Administration 2.420(d)(2), Plaintiff Terry Bollea, by and through his undersigned counsel, hereby certifies that filed herewith, Confidential Exhibits 1, 2, 3 and 4 of Mr. Bollea's Motion to Compel and Request for Ruling on Claim of Privilege Associated with Transfer Pricing Study, are documents containing "confidential information" as described in Rule 2.420(c)(9), specifically:

- A. The Redacted Portions of His Renewed Motion to Compel and Request for Ruling on Claim of Privilege Associated with Transfer Pricing Study**
- B. Confidential Exhibit 1 (License Agreement);**
- C. Confidential Exhibit 2 (Promissory Notes);**
- D. Consolidated Confidential Exhibit 3 (J. Donohue Expert Report and Appendix); and**
- E. Confidential Exhibit 4 (Kinja's Auditor's Report).**

The confidential information within the documents is located within the **entirety** of the following:

- A. The Redacted Portions of His Renewed Motion to Compel and Request for Ruling on Claim of Privilege Associated with Transfer Pricing Study**
- B. Confidential Exhibit 1 (License Agreement);**
- C. Confidential Exhibit 2 (Promissory Notes);**
- D. Consolidated Confidential Exhibit 3 (J. Donohue Expert Report and Appendix); and**
- E. Confidential Exhibit 4 (Kinja's Auditor's Report).**

Plaintiff filed this Notice to comply with the e-filing procedures. He also has contemporaneously filed a Motion to Determine the Confidentiality of Court Records consistent with Rule 2.420(d)(3), because Rule 2.420(c)(9) governs the type of confidential information at issue.

Dated: May 9, 2016.

Respectfully submitted,

/s/ Kenneth G. Turkel

Kenneth G. Turkel, Esq.

Florida Bar No. 867233

Shane B. Vogt

Florida Bar No. 0257620

BAJO | CUVA | COHEN | TURKEL

100 North Tampa Street, Suite 1900

Tampa, Florida 33602

Tel: (813) 443-2199

Fax: (813) 443-2193

Email: kturkel@bajocuva.com

Email: svogt@bajocuva.com

Charles J. Harder, Esq.

PHV No. 102333

HARDER MIRELL & ABRAMS LLP

132 South Rodeo Drive, Suite 301

Beverly Hills, CA 90212-2406

Tel: (424) 203-1600

Fax: (424) 203-1601

Email: charder@hmalfirm.com

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 9th day of May, 2016 to the following:

Gregg D. Thomas, Esquire
Rachel E. Fugate, Esquire
Thomas & LoCicero PL
601 S. Boulevard
Tampa, Florida 33606
gthomas@tlolawfirm.com
rfugate@tlolawfirm.com
kbrown@tlolawfirm.com
abcene@tlolawfirm.com
Counsel for Gawker Defendants

David R. Houston, Esquire
Law Office of David R. Houston
432 Court Street
Reno, NV 89501
dhouston@houstonatlaw.com
krosser@houstonatlaw.com

Seth D. Berlin, Esquire
Paul J. Safier, Esquire
Alia L. Smith, Esquire
Michael D. Sullivan, Esquire
Levine Sullivan Koch & Schulz, LLP
1899 L. Street, NW, Suite 200
Washington, DC 20036
sberlin@lskslaw.com
psafier@lskslaw.com
asmith@lskslaw.com
msullivan@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

Michael Berry, Esquire
Levine Sullivan Koch & Schultz, LLP
1760 Market Street, Suite 1001
Philadelphia, PA 19103
mberry@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

/s/ Kenneth G. Turkel

Kenneth G. Turkel