

# EXHIBIT A

\*\*\*ELECTRONICALLY FILED 11/12/2013 2:56:41 PM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY\*\*\*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

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

Case No. 12012447CI-011

-----)  
TERRY GENE BOLLEA professionally  
known as HULK HOGAN,

Plaintiff,

vs.

HEATHER CLEM, GAWKER MEDIA, LLC a/k/a  
GAWKER MEDIA, GAWKER MEDIA GROUP, INC.  
a/k/a GAWKER MEDIA, GAWKER ENTERTAINMENT,  
LLC, GAWKER TECHNOLOGY, LLC, GAWKER SALES,  
LLC, NICK DENTON, A.J. DAULERIO,  
KATE BENNERT and BLOGWIRE HUNGARY SZELLEMI  
ALKOTAST HASZNOSITO KFT a/k/a GAWKER MEDIA,

Defendants.  
-----)

VIDEOTAPED DEPOSITION OF

SCOTT KIDDER

New York, New York

Tuesday, October 1, 2013

Reported by:  
Toni Allegrucci  
JOB NO. 10069

1 S. Kidder

2 Q. How does it do so not in any manner  
3 other than in the regular course of business?

4 A. The sole purpose of Gawker Media  
5 Group Incorporated is to facilitate ownership  
6 in Gawker Media, LLC and Kinja Hungarian  
7 Corporation, as part of that sometimes  
8 Gawker Media Group, Incorporated undertakes  
9 stock buybacks in which it will purchase back  
10 some of its own stock from any shareholders.

11 Q. Okay. In your last response you  
12 identified a Kinja Hungary entity?

13 A. Yes.

14 Q. What entity is that specifically?

15 A. Kinja KFT.

16 Q. What kind of an entity is that?

17 A. Kinja is an intellectual property  
18 holding and technology development company.

19 Q. What is the relationship between  
20 Kinja KFT and Gawker Media, LLC?

21 A. They are 100 percent fully owned by  
22 Gawker Media Group Incorporated and they have  
23 entered into various agreements between each  
24 other.

25 Q. When was Kinja -- is Kinja KFT a

1 S. Kidder

2 corporation?

3 A. It's a Hungarian corporation.

4 Q. When was it incorporated?

5 A. I don't know the specific date, but  
6 it would have been in the early 2000s.

7 Q. Who are the officers of that  
8 entity?

9 A. I am -- Scott Kidder is the  
10 managing director.

11 Q. Any other officers?

12 A. I'm, I'm not aware of any other  
13 officers.

14 Q. Any directors?

15 A. I'm a managing director. I'm not  
16 aware of any other directors.

17 Q. You indicated that Kinja KFT --  
18 well, let me go back. What is the  
19 relationship between Kinja KFT and -- strike  
20 that.

21 So Kinja KFT then is in effect a  
22 wholly-owned subsidiary of Gawker Media  
23 Group, Inc.?

24 A. Yes.

25 Q. Okay. And when you say it holds

1 S. Kidder  
2 called Blogwire Hungary, and I'll spell the  
3 next name, S-z-e-l-l-e-m-i, new word  
4 A-l-k-o-t-a-s-t, new word  
5 H-a-s-z-n-o-s-i-t-o, KFT?

6 A. Yes.

7 Q. And what is that entity?

8 A. Blogwire Hungary has been renamed  
9 to Kinja KFT.

10 Q. When did that renaming occur?

11 A. Earlier this year.

12 Q. To your enormous relief, I hope?

13 A. Yes; I can't pronounce it either.

14 Q. And why was it renamed, do you  
15 know?

16 A. Because Kinja is the name of our  
17 platform which is owned and development --  
18 and developed in Hungary and so it was  
19 decided to rename it with a name more  
20 consistent with its activities. I'm not sure  
21 what a Blogwire is.

22 Q. Okay. Aside from the entities we  
23 have already discussed are there any other  
24 affiliated, parent, subsidiary or related  
25 companies to Gawker Media, LLC?

1 S. Kidder

2 A. It, it seemed to.

3 Q. Do you have any idea for how long  
4 the Hulk Hogan sex tape video excerpts were  
5 unavailable?

6 A. I don't know a specific time frame,  
7 But I, I'm sure that we noticed rather  
8 quickly, so I'd imagine, you know, somewhere  
9 between 24 and 36 hours, but that's just a  
10 guess.

11 Q. All right. So you are not aware of  
12 any period longer than that 24 to 36 hour  
13 time frame when the Hulk Hogan sex tape video  
14 was unavailable prior to the court order that  
15 was entered in this matter?

16 A. No.

17 Q. Okay. If the story was unavailable  
18 for 24 to 36 hours, why would that have been  
19 of concern to Gawker Media?

20 A. Because Gawker Media publish --  
21 published the story and Gawker Media, LLC is  
22 solely responsible for its content and  
23 Gawker Media gets to make the determination  
24 when and if any stories come down outside of  
25 a court order, not a random vendor.