

EXHIBIT 3

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. 12012447CI-011

HEATHER CLEM. et al.,

Defendants.

**[PROPOSED] ORDER RE: MOTIONS OF PLAINTIFF FOR PROTECTIVE ORDER
AND MOTION OF GAWKER MEDIA, LLC AND A. J. DAULERIO TO COMPEL
FURTHER RESPONSES TO WRITTEN DISCOVERY**

Plaintiff Terry Bollea's two motions for protective order, filed on or about August 26 and October 8, 2013, and Defendants Gawker Media, LLC and A.J. Daulerio's Motion to Compel Further Discovery filed on or about September 11, 2013, came on for hearing on Tuesday, October 29, 2013 at 10:22 a.m. The court heard oral argument from counsel for all parties, from that time through 12:31 pm. Charles J. Harder and Kenneth G. Turkel appeared for Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan. Seth D. Berlin, Alia L. Smith and Gregg D. Thomas appeared for defendants Gawker Media, LLC and A.J. Daulerio. Barry A. Cohen appeared for defendant Heather Clem. The court, having received and reviewed all papers filed in support of and opposition to each of the three motions, including opposition briefs, reply briefs, affidavits and attached exhibits, and having received oral argument on the issues, and good cause appearing therefor, hereby rules as follows:

1. The depositions of plaintiff Terry Bollea and nonparty witnesses Jennifer Bollea and Linda Bollea may be videotaped pursuant to Florida Rule of Civil Procedure 1.310(b)(4).

Any such video recordings will be sealed, maintained and viewed only by the attorneys representing the parties in this case, and no portion of any such recording may be disseminated to any person or entity other than the attorneys representing the parties in this action absent further order of the court.

2. The deposition of Terry Bollea will be limited to a maximum of two days of testimony, absent further order of the court or agreement of the parties.

3. The depositions of Jennifer Bollea and Linda Bollea each will be limited to a maximum time period of five hours of testimony, absent further order of the court or agreement of the parties.

4. For purposes of depositions, interrogatory responses, requests for production of documents, and all other types of discovery, inquiry into the medical records, names of physicians, financial records, names of tax preparers, divorce proceedings, and all sexual and romantic relationships of Terry Bollea and Heather Clem, respectively, with the sole exception of the sexual and/or romantic relationship between Terry Bollea and Heather Clem (as to the time period of January 1, 2002 to the present), is hereby prohibited, absent further order of the court, and Terry Bollea's objections to such discovery are sustained except for his objections as to his relationship with Heather Clem, as to the time period of January 1, 2002 to the present.

This portion of the Court's ruling is based on the representations of Terry Bollea's counsel at the hearing that (a) Terry Bollea is not asserting claims for any physical injury and is limiting claims for emotional injuries to "garden variety emotional distress damages", and (b) Terry Bollea is not seeking damages "to his career" (including without limitation that his "brand" has been diminished or that he has lost business opportunities), and intends to limit his claims for economic damages to claims for (i) the "commercial value in a celebrity sex tape" of the Plaintiff

and (ii) financial benefit to Gawker based on the “value that they got [which] is the value of a celebrity sex tape in which Hulk Hogan is the star.”

5. Without intending to limit Terry Bollea’s obligation to provide supplemental responses to interrogatories and requests for production of documents, in a manner consistent with the foregoing ruling, Terry Bollea shall serve a further response to Gawker Media, LLC’s Interrogatory No. 12, regarding the identity and basis of his damages claims, by no later than the close of business on November 8, 2013.

6. By the close of business on November 8, 2013, Terry Bollea shall provide a privilege log of all documents as to which he claims privilege, other than those documents created after this litigation was filed.

7. Consistent with the Court’s Order dated October 29, 2013, referring this action to Special Magistrate James R. Case, any further issues relating to the implementation of the foregoing order shall be directed to the special magistrate. Other already-pending discovery motions will be addressed by the Court at the hearing scheduled for November 25, 2013.

DATED: _____

HON. PAMELA CAMPBELL