

EXHIBIT E

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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.
-----)
CONFIDENTIAL PORTION INCLUDED
VIDEOTAPED DEPOSITION OF
ALBERT JAMES DAULERIO
New York, New York
Monday, September 30, 2013
Reported by:
Toni Allegrucci
JOB NO. 337256

1 A.J. Daulerio
2 sexuality and their sexual practices and, you
3 know, how they are perceived in the public
4 sometimes it's newsworthy.

5 Q. Well, my question is do you see any
6 hypocrisy in Gawker's practice of publishing
7 the Hulk Hogan sex tape and declining to out
8 the sexuality of every celebrity that it is
9 aware of?

10 MR. BERLIN: Objection.

11 You can answer.

12 A. No, I don't think those two are
13 tied together whatsoever.

14 Q. Okay. And why not?

15 A. Because every story is different
16 and there's no official mandate to basically,
17 A, run every single sex tape that's sent to
18 us, B, out every celebrity that we think is
19 gay or not gay and vice versa, etc., et al.,
20 blah, blah, blah.

21 MR. MIRELL: Okay. On that note I
22 don't believe I have any further
23 questions of this witness today.

24 To the extent that there are
25 additional documents that are disclosed

1 A.J. Daulerio
2 and that are discovered and are made
3 available to us I want to reserve the
4 opportunity to ask the witness
5 additional questions about that
6 information. So I would be prepared to
7 adjourn the deposition for today with
8 that reservation.

9 MR. BERLIN: I have no questions
10 for the witness. And the discovery in
11 this case was produced at the end of
12 July so that if there were concerns
13 about the sufficiency of the production
14 of documents that could have been raised
15 well in advance of the witness being
16 here, so that they could be -- we
17 wouldn't take up this witness's time
18 more than once, and we would object to
19 recalling the witness for that reason,
20 but otherwise I think we can conclude
21 today.

22 MR. MIRELL: Okay. Well, let me
23 just say for the record that you advised
24 me during the course of the deposition
25 today, Mr. Berlin, that there's at least