

# EXHIBIT 1

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March 18, 2014

VIA OVERNIGHT MAIL

The Honorable Pamela A.M. Campbell  
Sixth Judicial Circuit  
St. Petersburg Judicial Building  
545 First Avenue N., Room 300  
St. Petersburg, FL 33701

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

Dear Judge Campbell,

Enclosed please find a proposed order granting the Fifth Motion to Compel Discovery from Plaintiff, along with Judge Case's Report and Recommendation, issued on February 28, 2014, recommending that the motion be granted. Plaintiff filed "Exceptions" to the Report and Recommendation on March 6, 2014, and submitted to Your Honor the parties' respective briefs on the Motion, as well as a transcript of the hearing held by Judge Case on February 24, 2014, so we are not resubmitting those materials herewith. We have enclosed a courtesy copy of Defendants' Response to Plaintiff's Exceptions, as well as a supporting affidavit from Seth Berlin, which were filed today.

If the Court is inclined to affirm Judge Case's Report and Recommendation granting the Motion, we respectfully request that the Court enter the enclosed proposed order. If the Court would like to hear the matter, we request that it do so after the hearing on the Gawker Defendants' motions to dismiss, scheduled for the afternoon of April 23, 2014.

The Honorable Pamela A.M. Campbell

March 18, 2014

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Thank you very much.

Respectfully yours,

THOMAS & LOCICERO PLLC

A handwritten signature in black ink, appearing to read "Gregg D. Thomas". The signature is fluid and cursive, with a prominent loop at the end.

Gregg D. Thomas

cc: All counsel of record (via email)  
Hon. James R. Case (with enclosures)

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.

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**ORDER**

This cause came before Special Discovery Magistrate James Case on February 24, 2014, on the Fifth Motion of Gawker Media, LLC (“Gawker”) and A.J. Daulerio (together, “Defendants”) to Compel Discovery from Plaintiff (the “Motion”). At that hearing, Judge Case concluded that the Motion should be GRANTED and that, in light of depositions commencing March 3, 2014, plaintiff be required to furnish to counsel for movants all discovery requested in the Motion by no later than 4:00 p.m. on Thursday, February 27, 2014, including full and complete responses to Daulerio Interrogatory Nos. 9 and 10 and Gawker Requests for Production Nos. 51, 52 and 54. On February 28, 2014, Judge Case issued a REPORT & RECOMMENDATION memorializing that recommendation. Plaintiff filed Exceptions to Judge Case’s REPORT & RECOMMENDATION, to which Defendants have responded.

After reviewing and considering the REPORT & RECOMMENDATION of the Special Discovery Magistrate, the parties’ briefs on the Motion and on Plaintiff’s Exceptions, and the transcript of the hearing before Judge Case, and being fully advised of the premises, IT IS HEREBY ORDERED AND ADJUDGED that:

1. The REPORT & RECOMMENDATION dated February 28, 2014 is  
AFFIRMED;
2. Defendants' Motion is GRANTED; and
3. Plaintiff shall be required to furnish all of the discovery requested in the Motion  
to counsel for movants within seven days of the date of this Order, including  
specifically full and complete responses to Daulerio Interrogatory Nos. 9 and 10  
and Gawker Requests for Production Nos. 51, 52 and 54.

DONE AND ORDERED in Chambers at Pinellas County, Florida this \_\_\_\_ day of  
\_\_\_\_\_, 2014.

\_\_\_\_\_  
Pamela A.M. Campbell  
Circuit Court Judge

Copies furnished to:  
Counsel of Record