

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

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

Case No.: 12012447-CI-011

vs.

HEATHER CLEM; GAWKER MEDIA,
LLC aka GAWKER MEDIA; et al.,

Defendants.

**JOINT STIPULATION REGARDING SUBPOENA DIRECTED TO TNA
ENTERTAINMENT, LLC**

Plaintiff Terry Gene Bollea ("Bollea") and each of the undersigned Defendants jointly stipulate as follows with respect to the Subpoena Duces Tecum directed to TNA Entertainment, LLC ("TNA"), a non-party witness located in Tennessee, that Defendant Gawker Media, LLC ("Gawker") seeks to serve:

1. On July 7, 2014, Gawker filed nine Notices of Intent to Serve Subpoenas for Production of Documents without Deposition and corresponding proposed Subpoenas Duces Tecum without Deposition. Included in the proposed subpoenas was a subpoena directed to TNA.
2. On July 17, 2014, Bollea filed timely objections to the proposed subpoenas, objecting to certain Requests.
3. On November 11, 2014, the Special Discovery Magistrate, the Honorable James R. Case, issued a Report and Recommendation sustaining Bollea's objections and recommending that Gawker be permitted to serve the subpoenas, including the subpoena to TNA, without the objected-to Requests.

4. On December 3, 2014, the Court (Campbell, J.) issued an order adopting the Special Discovery Magistrate's Report and Recommendation.

5. The undersigned parties agree that, in addition to the Requests Gawker is permitted to serve under the Court's order adopting the Special Discovery Magistrate's Report and Recommendation, Gawker may also serve Requests numbered 6, 10, 12, and 18 on the proposed subpoena to TNA attached as Exhibit A.

Dated: December 10, 2014

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of December, 2014, I caused a true and correct copy of the foregoing to be served electronically upon the following counsel of record at their respective email addresses via the Florida Courts E-Filing Portal:

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