

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 DEPOSITIONS OF, AND TESTIMONY
CONCERNING, JENNIFER BOLLEA, NICK BOLLEA AND BROOKE BOLLEA**

Plaintiff Terry Gene Bollea ("Mr. Bollea") and Defendants Gawker Media, LLC, Nick Denton and A.J. Daulerio (collectively, "Defendants") jointly stipulate that neither Defendants nor Mr. Bollea will subpoena, depose or call to testify at trial Jennifer Bollea, Nick Bollea or Brooke Bollea (Mr. Bollea's wife and children), and Mr. Bollea will not testify at trial about Jennifer Bollea's, Nick Bollea's or Brooke Bollea's emotional states, statements, reactions, attitudes, facial expressions, or any symptoms of *their* (Jennifer, Nick or Brooke's) emotional distress in any way relating to the publication by Defendants, or any other person or entity, of anything related to any sex video featuring Mr. Bollea and Heather Cole f/k/a Clem ("Sex Video Footage"), including without limitation when they first learned of any publication relating to the Sex Video Footage, or their subsequent communications with Mr. Bollea or third parties about the Sex Video Footage. Nor may Mr. Bollea testify about the effect of any such publication on his relationship with Jennifer, Nick or Brooke. Mr. Bollea may, however, testify about the *existence* of his wife and children, and *his own* distress relating to the publication of the Sex Video Footage.

The parties hereby further stipulate that neither party will comment to the jury regarding either side's failure to call as witnesses Jennifer Bollea, Nick Bollea and/or Brooke Bollea regarding any of the facts at issue in the trial.

Dated: January 22, 2015

Respectfully submitted,

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THOMAS & LOCICERO PL

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of January, 2015, 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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