

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.

FILED
ST. PETERSBURG DISTRICT
2015 FEB -5 AM 8:35
KEN BURKE
CLERK OF CIRCUIT COURT

STIPULATED ORDER REGARDING DEPOSITION OF MATT LOYD

Plaintiff Terry Gene Bollea ("Bollea"), each of the undersigned Defendants, and non-party witness Matt Loyd ("Loyd") jointly stipulate as follows with respect to the deposition of Loyd that has been noticed for January 28, 2015:

1. On January 8, 2015, Defendant Gawker Media, LLC ("Gawker") served a Subpoena Ad Testificandum on Loyd, commanding him to appear for a deposition and provide testimony at the offices of Thomas & LoCicero, PL, 601 South Boulevard, Tampa, FL 33606 at 2:00 p.m. on January 28, 2015.
2. Loyd, through his counsel, has represented that, at that deposition, he intends to assert his right against self-incrimination under the Fifth Amendment to the United States Constitution in response to any and all questions relating in any conceivable way to the subject matter of the lawsuit, including, but not limited to, questions relating to any video recordings of Bollea and Defendant Heather Clem engaged in sexual activity.
3. Accordingly, solely in order to promote efficiency and avoid unnecessary burden and expense, the parties and Loyd hereby stipulate that Loyd is asserting his Fifth Amendment

right against providing testimony in this case by way of this stipulation and that he will not be required to physically appear at the deposition in order to assert that right.

4. Similarly, the parties and Loyd agree that Gawker is not, by way of this stipulation, withdrawing the subpoena for testimony it directed to Loyd, but, rather, that the litigation shall proceed as if Loyd did physically appear at the scheduled deposition and assert his Fifth Amendment right against providing testimony there.

5. The parties further stipulate that neither Defendants nor Bollea will subpoena or call Loyd to testify at the trial scheduled to begin on July 6, 2015, subpoena him for any further deposition prior to that trial, or attempt to admit as evidence at that trial the fact that he asserted his Fifth Amendment right against self-incrimination, or any inference arising therefrom, or in any other manner or respect attempt to use this stipulation or the subject matter addressed by this stipulation as evidence at that trial. This stipulation shall not bind any of the undersigned parties with respect to any subsequent retrial of this case.

Dated: January 21, 2015
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Respectfully submitted,
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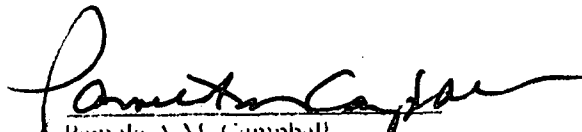


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Attorney for Non-Party Matt Loyd

SO ORDERED: St. Petersburg, Pinellas County

JAN 28 2015



Pamela A.M. Campbell
Circuit Court Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd 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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