

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 BUBBA CLEM

Plaintiff Terry Gene Bollea ("Bollea") and Defendant Gawker Media, LLC ("Gawker") jointly stipulate that Bollea is withdrawing his objections to the Subpoenas Duces Tecum without Deposition that Gawker intends to serve on Bubba Clem ("Clem") in light of Gawker's agreement to revise that subpoena in the manner indicated in this Stipulation. Bollea and Gawker jointly state as follows:

1. On January 7, 2015, Gawker filed a Notice of Intent to Serve a Subpoena for Production of Documents directed to Clem, along with a corresponding proposed Subpoenas Duces Tecum without Deposition.
2. On January 22, 2015, Bollea filed timely objections to the proposed subpoena, objecting to certain Requests.
3. Counsel for Gawker and counsel for Bollea subsequently conferred over the scope of the proposed subpoena and were able to reach agreement. Specifically, Bollea agreed to withdraw his objection to service of the subpoena provided that Gawker revised the subpoena in the manner indicated in Exhibit A (revised subpoena directed to Clem, attached hereto).

4. Accordingly, Bollea hereby stipulates that he has withdrawn his objection to the subpoena directed to Clem and he has no objection to its being served in the form indicated in Exhibit A.

Dated: January 30, 2015

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of ~~January~~ ^{February}, 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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