

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 WITNESSES BEN MALLAH, BAY HARBOR
HOTEL AND CONVENTION CENTER, LLC, DARREN PRINCE, PRINCE
MARKETING GROUP, AND PETER YOUNG**

Plaintiff Terry Gene Bollea (“Bollea”) and Defendants Gawker Media, LLC (“Gawker”),
Nick Denton, and A.J. Daulerio (collectively, “Defendants”) jointly stipulate as follows:

1. Between December 20, 2014 and January 31, 2015, Gawker served subpoenas for deposition and documents on the following witnesses: Ben Mallah, Bay Harbor Hotel and Convention Center, LLC, Darren Prince, Prince Marketing Group, and Peter Young (collectively, the “Witnesses”).
2. The subpoenas were issued after the Court entered an Order on December 2, 2014 adopting as “the ORDER of this Court,” the Special Discovery Magistrate’s November 11, 2014 Report and Recommendation that, *inter alia*, limited the documents that Gawker could seek from the Witnesses and provided that “defendants may not take discovery from plaintiff or any third parties of any financial information pertaining to (a) plaintiff, (b) plaintiff’s commercial affairs, or (c) the use of plaintiff’s image, name, or likeness.”
3. The Witnesses have represented that they do not have any documents responsive

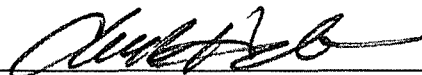
to the document subpoenas that Gawker served.

4. Plaintiff will not call any of the Witnesses to testify at trial.

5. In light of the foregoing, Defendants will not depose the Witnesses or call them to testify at trial.

Dated: February 25, 2015

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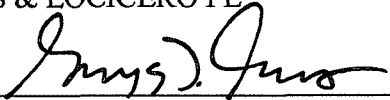
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Respectfully submitted,

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Nick Denton, and A.J. Daulerio*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of 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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