

EXHIBIT C

*(to Plaintiff's Motion for Leave to Conduct
Expedited Post-Trial Financial Worth Discovery)*

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.

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

Defendants.

_____ /

STIPULATION REGARDING DEFENDANTS' FINANCIAL WORTH

To streamline the remaining issues in this case, the parties stipulate to the following *solely for purposes of the punitive damages phase of the trial* and for no other purpose:

1. Solely for the purposes of present net worth as it relates to punitive damages in this litigation, Defendant, Gawker Media, LLC, has a pre-judgment, present value of \$83 million. Gawker Media LLC's gross revenues (i.e., before expenses) for 2015 were approximately \$48.7 million.

2. Defendant Nick Denton's principal asset is shares he owns in Gawker Media Group, Inc. ("GMGI"), the privately-held parent company of Gawker Media, LLC. For the purposes of present net worth solely for determining punitive damages in this litigation, GMGI has a pre-judgment, present value of \$276 million. GMGI's gross revenues in 2015 were \$49,951,750.

3. The present value of the portion of GMGI owned by Mr. Denton solely for purposes of punitive damages in this litigation is \$117 million.

4. Mr. Denton's assets other than his shares of GMGI total approximately \$3.6 million. These assets include the equity in his New York City condominium, the contents of his home, bank and retirement accounts, and shares in Vox, Inc.

5. Thus, Mr. Denton's total pre-judgement present net worth solely for purposes of punitive damages in this litigation is \$121 million.

6. Defendant A.J. Daulerio has no material assets and has student loan debt in the amount of \$27,000.

Dated: March 21, 2016

Respectfully submitted,

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