

EXHIBIT 11

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.

PLAINTIFF'S EXPERT DESIGNATIONS¹

Plaintiff Terry Gene Bollea, by counsel and pursuant to Paragraphs 7 and 9 of the Order Setting Pre-Trial Conference and Jury Trial, sent to the Court on February 13, 2015, submits the following list of expert witnesses who are expected to testify at trial:

1. Jeff Anderson
c/o Charles J. Harder
Harder Mirell & Abrams LLP
1925 Century Park East, Suite 800
Los Angeles, California 90067

Please refer to the accompanying Expert Report of Jeff Anderson, at **Exhibit 1**, for the following: (1) the subject matter about which Mr. Anderson is expected to testify; (2) the substance of the facts and opinions about which Mr. Anderson is expected to testify; (3) a summary of the grounds for each of Mr. Anderson's opinions; (4) a copy of Mr. Anderson's qualifications, as well as citations to all cases in which he has testified at any deposition, hearing, or trial as an expert, going back three years (Appendix A); (5) the scope of Mr. Anderson's

¹ All Exhibits referenced herein are being provided to Defendants on a disc and sent via Fed Ex for next business day delivery.

employment in the pending case; and (6) a list of all documents relied upon by Mr. Anderson in forming his opinions (Appendix B).

Copies of documents relied upon by Mr. Anderson, which are not pleadings in this case, transcripts of deposition testimony taken in this case, or documents previously produced by a party in this case, are provided concurrently herewith at **Exhibit 2**.

Mr. Anderson's compensation in this case is the following: \$495 per hour.

Mr. Anderson has performed work for plaintiffs in approximately 50 percent of the cases where he has provided expert services, and has performed work for defendants in approximately 50 percent of cases. Mr. Anderson approximates the portion of his involvement as an expert witness as approximately 50 percent, which is based on the percentage of hours he has served as an expert witness.

2. Professor Mike Foley
c/o Charles J. Harder
Harder Mirell & Abrams LLP
1925 Century Park East, Suite 800
Los Angeles, California 90067

Please refer to the accompanying Expert Report of Professor Mike Foley, at **Exhibit 3**, for the following: (1) the subject matter about which Professor Foley is expected to testify; (2) the substance of the facts and opinions about which Professor Foley is expected to testify; (3) a summary of the grounds for each of Professor Foley's opinions; (4) a copy of Professor Foley's qualifications (Exhibit to Report); and (5) the scope of Professor Foley's employment in the pending case.

A list of all documents relied upon by Professor Foley in forming his opinions is provided at **Exhibit 4** to this Expert Witness List. Copies of documents relied upon by Professor Foley, which are not pleadings in this case, transcripts of hearings and deposition testimony

taken in this case, or documents previously produced by a party in this case, are provided concurrently herewith at **Exhibit 5**.

Professor Foley's compensation in this case is the following: \$250 per hour; \$350 per hour for his time in deposition and trial.

Professor Foley has not performed work for plaintiffs until being retained for this matter, and has performed work for defendants in the only matters for which he has been previously retained to provide expert services. He did not testify in either of the previous matters, both of which were more than three years ago. Professor Foley approximates the portion of his involvement as an expert witness as less than ten percent, which is based on the percentage of hours he has served as an expert witness.

3. Professor Leslie K. John
c/o Charles J. Harder
Harder Mirell & Abrams LLP
1925 Century Park East, Suite 800
Los Angeles, California 90067

Professor Leslie K. John is expected to testify concerning the value of a person's right of privacy, including the value of the loss of privacy to a person similarly situated to Hulk Hogan who has a secretly-filmed tape of him naked and having sex released on the Internet without his consent. Professor John's opinions in this area will be based on her professional background, knowledge, training, and education, as well as her extensive research in behavioral economics, as that discipline is applied to an individual's valuation of his or her privacy. Professor John's opinions also will be based on the results of a survey she will conduct, which will determine a range of reasonable or fair compensation for being observed naked and having sex on a video published and viewed online without consent.

A list of all documents relied upon by Professor John, to date, is provided at **Exhibit 6** to this Expert Witness List. Copies of documents relied upon by Professor John, to date, which are not pleadings in this case, transcripts of deposition testimony taken in this case, or documents previously produced by a party in this case, are provided concurrently herewith at **Exhibit 7**.

Professor John's investigation and research are ongoing. Upon completion of Professor John's research and investigation, Plaintiff will supplement this disclosure with Professor John's opinions and findings, the basis therefor, and the documents and resources on which she relied.

A copy of Professor John's qualifications is provided herewith at **Exhibit 8**.

Professor John's compensation in this case is the following: \$450 per hour.

Professor John has never served as an expert witness prior to her involvement in this case. For this reason, Plaintiff cannot provide the following information: (1) citations to all cases in which Professor John has testified at any deposition, hearing, or trial as an expert, going back three years; (2) the percentage of work performed for plaintiffs and defendants; and (3) an approximation of the portion of Professor John's involvement as an expert witness.

4. Shanti Shunn
c/o Charles J. Harder
Harder Mirell & Abrams LLP
1925 Century Park East, Suite 800
Los Angeles, California 90067

Please refer to the accompanying Expert Reports of Shanti Shunn, at **Exhibits 9 & 10**, for the following: (1) the subject matter about which Mr. Shunn is expected to testify; (2) the substance of the facts and opinions about which Mr. Shunn is expected to testify; (3) a summary of the grounds for each of Mr. Shunn's opinions; and (4) the scope of Mr. Shunn's employment in the pending case.

A list of all documents relied upon by Mr. Shunn in forming his opinions is provided at **Exhibits 11 & 12** to this Expert Witness List. Copies of documents relied upon by Mr. Shunn, which are not pleadings in this case, transcripts of deposition testimony taken in this case, or documents previously produced by a party in this case, are provided concurrently herewith at **Exhibits 13 & 14**.

A copy of Mr. Shunn's qualifications is provided herewith at **Exhibit 15**.

Mr. Shunn's compensation in this case is the following: \$400 per hour; \$550 per hour for his time in trial.

Mr. Shunn has never served as an expert witness prior to his involvement in this case. For this reason, Plaintiff cannot provide the following information: (1) citations to all cases in which Mr. Shunn has testified at any deposition, hearing, or trial as an expert, going back three years; (2) the percentage of work performed for plaintiffs and defendants; and (3) an approximation of the portion of Mr. Shunn's involvement as an expert witness.

5. Rebuttal expert witnesses designated on March 27, 2015.
6. Any and all expert witnesses listed or otherwise identified by defendants Heather Clem, Gawker Media LLC, A.J. Daulerio, Nick Denton and/or Kinja KFT (formally Blogwire Hungary Szellemi Alkotast Hasznosito KFT).
7. Any and all impeachment and rebuttal expert witnesses.
8. Additional expert(s) and/or expert opinion(s) may be provided once Defendant Gawker Media, LLC fully complies with its discovery obligations, including producing its corporate designee for further deposition, and/or upon Plaintiff's receipt of documents and testimony sought from Young America Capital, LLC.
9. All expert witnesses learned of subsequent to the filing of this Expert Witness List.
10. Expert Discovery is ongoing. Plaintiff reserves his right to supplement this Expert Witness List.

DATED: March 6, 2015

/s/ Charles J. Harder

Charles J. Harder, Esq.

PHV No. 102333

Douglas E. Mirell, Esq.

PHV No. 109885

Sarah E. Luppen, Esq.

PHV No. 113729

HARDER MIRELL & ABRAMS LLP

1925 Century Park East, Suite 800

Los Angeles, CA 90067

Tel: (424) 203-1600

Fax: (424) 203-1601

Email: charder@hmafirm.com

Email: dmirell@hmafirm.com

Email: sluppen@hmafirm.com

-and-

Kenneth G. Turkel, Esq.

Florida Bar No. 867233

Shane B. Vogt, Esq.

Florida Bar No. 0257620

BAJO CUVA COHEN & TURKEL, P.A.

100 North Tampa Street, Suite 1900

Tampa, Florida 33602

Tel: (813) 443-2199

Fax: (813) 443-2193

Email: kturkel@bajocuva.com

Email: svogt@bajocuva.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-Mail this 6th day of March 2015 to the following:

Gregg D. Thomas, Esquire
Rachel E. Fugate, Esquire
Thomas & LoCicero PL
601 S. Boulevard
Tampa, Florida 33606
gthomas@tlolawfirm.com
rfugate@tlolawfirm.com
kbrown@tlolawfirm.com
Counsel for Gawker Defendants

Barry A. Cohen, Esquire
Michael W. Gaines, Esquire
The Cohen Law Group
201 E. Kennedy Blvd., Suite 1950
Tampa, Florida 33602
bcohen@tampalawfirm.com
mgaines@tampalawfirm.com
jhalle@tampalawfirm.com
mwals@tampalawfirm.com
Counsel for Heather Clem

Seth D. Berlin, Esquire
Michael Sullivan, Esquire
Alia L. Smith, Esquire
Paul J. Safier, Esquire
Levine Sullivan Koch & Schulz, LLP
1899 L. Street, NW, Suite 200
Washington, DC 20036
sberlin@lskslaw.com
psafier@lskslaw.com
asmith@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

David R. Houston, Esquire
Law Office of David R. Houston
432 Court Street
Reno, NV 89501
dhouston@houstonatlaw.com

Michael Berry, Esquire
Levine Sullivan Koch & Schultz, LLP
1760 Market Street, Suite 1001
Philadelphia, PA 19103
mberry@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

/s/ Sarah E. Luppen
Attorney