

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 THE ABILITY TO VIEW THE GAWKER-
EDITED VIDEO AT THIRD-PARTY WEBSTIES**

For purposes of summary judgment and trial, Plaintiff Terry Gene Bollea (“Mr. Bollea”) and Defendants Gawker Media, LLC, Nick Denton and A.J. Daulerio (collectively, “Defendants”) jointly stipulate to the following:

1. **Exhibit A** is a list of websites, with specific URL addresses for webpages therein, preserved by paralegals and/or junior attorneys working under the supervision of Charles J. Harder in the course of the above-referenced litigation.
2. If the webpage was exhibiting either: (1) the one minute and forty-one second video at issue in this litigation that was published at Gawker.com beginning October 4, 2012 (the “Video”); or (2) a shorter version of the Video excerpted from the original Video, but which included Mr. Bollea naked and/or engaged in sexual activity, the webpage was preserved.
3. The Video, or video excerpts of the Video showing sex and/or nudity, could be viewed at each of the webpages listed at **Exhibit A**.
4. **Exhibit B**, previously produced by Plaintiff as BOLLEA 004626, is a preservation of one such webpage appearing on the Daily Motion website, and is the webpage

that Gawker linked to when it removed the Video from A.J. Daulerio's original post containing the Video on Gawker.com. At the time that Gawker linked to the Daily Motion website, the Video could be viewed at that website.


5. The parties reserve all objections as to the admissibility of the documents on any other basis.


Dated: March 25, 2015

Respectfully submitted,

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THOMAS & LOCICERO PL

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2th day of March, 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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