

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
WORLD WRESTLING ENTERTAINMENT, INC.**

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

1. During the course of discovery in the above-captioned litigation, Gawker served a subpoena for deposition and documents on World Wrestling Entertainment, Inc. (“WWE”).
2. The subpoena was 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 and deposition topics that Gawker could seek from WWE 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. On March 2, 2015, WWE produced documents in response to the subpoena and subsequently agreed to provide a business records certification for those documents.
4. Plaintiff will not call WWE or any employee of WWE, other than Bollea, to testify at trial.

5. In light of the foregoing, Gawker will not depose WWE or call WWE or any employee of WWE, other than Bollea, to testify at trial.

6. For purposes of clarity, "employee of WWE" shall not include any person currently identified by name on Bollea's or Defendants' Witness Lists, filed March 2, 2015, who may be a current or former employee of WWE.

Dated: March 11, 2015

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd 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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