IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT IN AND FOR PINELLAS COUNTY, FLORIDA

TERRY GENE BOLLEA professionally known as HULK HOGAN,

Plaintiff.

VS.

Case No. 12012447CI-011

HEATHER CLEM; GAWKER MEDIA, LLC aka GAWKER MEDIA; GAWKER MEDIA GROUP, INC. aka GAWKER MEDIA; GAWKER ENTERTAINMENT, LLC; GAWKER TECHNOLOGY, LLC; GAWKER SALES, LLC; NICK DENTON; A.J. DAULERIO; KATE BENNERT, and BLOGWIRE HUNGARY SZELLEMI ALKOTAST HASZNOSITO KFT aka GAWKER MEDIA,

	Defendants.	

NOTICE OF CONFIDENTIAL INFORMATION WITHIN COURT FILING

On behalf of Plaintiff, Terry Gene Bollea, and pursuant to Florida Rule of Judicial Administration 2.420(c)(9) and/or the Agreed Protective Order Governing Confidentiality entered by this Court on July 25, 2013, I hereby certify that I am filing herewith a document containing **confidential information** as described in Rule 2.420(c)(9) and/or the Agreed Protective Order Governing Confidentiality, and that the **confidential information within the document is precisely located at**:

- 1. The following pages within Plaintiff's Motion for Leave to Add a Claim for Punitive Damages:
 - A. **Page 7**—Confidential Information is boxed for redaction;
 - B. Page 16—Confidential Information is boxed for redaction;

{BC00064087:1}

- C. **Page 17**—Confidential information is boxed for redaction;
- D. **Pages 21-22**—Confidential information is boxed for redaction.
- 2. The following portions of the Exhibits to the Plaintiff's Motion for Leave to Add a Claim for Punitive Damages [these pages have been marked "Confidential]:
 - A. Exhibit 2: Pages 133-136 (Deposition Transcript of Nick Denton)
 - B. Exhibit 3: Entire Exhibit
 - C. Exhibit 4: Entire Exhibit
 - D. Exhibit 5: Entire Exhibit
 - E. Exhibit 19: Entire Exhibit
 - F. Exhibit 21: Entire Exhibit
 - G. Exhibit 34: Entire Exhibit
 - H. Exhibit 32: Entire Exhibit
 - I. Exhibit 39: Entire Exhibit

/s/ Kenneth G. Turkel

Kenneth G. Turkel, Esq. Florida Bar No. 867233 Christina K. Ramirez, Esq. Florida Bar No. 954497 BAJO | CUVA | COHEN | TURKEL 100 North Tampa Street, Suite 1900 Tampa, Florida 33602

Tel: (813) 443-2199 Fax: (813) 443-2193

Email: kturkel@bajocuva.com
Email: cramirez@bajocuva.com

-and-

Charles J. Harder, Esquire PHV No. 102333 Harder Mirell & Abrams LLP 1925 Century Park East, Suite 800 Los Angeles, CA 90067

Tel: (424) 203-1600 Fax: (424) 203-1601 charder@hmafirm.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 via the e-portal system this 3rd day of April, 2015 to the following:

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
mwalsh@tampalawfirm.com
Counsel for Heather Clem

David R. Houston, Esquire Law Office of David R. Houston 432 Court Street Reno, NV 89501 dhouston@houstonatlaw.com krosser@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 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
pmcgonigle@tlolawfirm.com
Counsel for Gawker Defendants

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

/s/ Kenneth G. Turkel
Attorney