

**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. 12012447 CI-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.

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**MOTION TO DETERMINE CONFIDENTIALITY OF COURT RECORDS**

Pursuant to Rule 2.420 of the Florida Rules of Judicial Administration and this Court's Agreed Protective Order Governing Confidentiality, dated July 25, 2013 (the "Confidentiality Order"), Plaintiff Terry Gene Bollea, by and through his undersigned counsel, hereby moves to determine the confidentiality of the Confidential Affidavit of Charles J. Harder.

As grounds for this motion, Plaintiff states as follows:

1. Florida Rule of Judicial Administration 2.420(c)(9)(A)(iv) provides that certain court records are confidential if the Court determines that confidentiality is required in order to "obtain evidence to determine legal issues in a case."

2. This Court's Confidentiality Order provides that both the parties and non-party witnesses may designate testimony and/or documents as "confidential" if their substance falls into certain enumerated categories.

3. Concurrent with this Motion, Plaintiff is filing the Confidential Affidavit of Charles J. Harder, which describes a conversation that Defendants' counsel designated as "Confidential," and therefore pursuant to the parties' Confidentiality Order.

4. Counsel for Plaintiff certifies that this motion is made in good faith and is supported by a sound factual and legal basis. Without in any way conceding that the conversation described in the Confidential Affidavit has been properly designated as "Confidential" by the other parties making that designation, Plaintiff is filing this motion in compliance with Rule 2.420 and this Court's Confidentiality Order.

WHEREFORE, Plaintiff respectfully requests that this Court determine the confidentiality of the Affidavit, including to treat as confidential only those portions which are properly treated as such under Rule 2.420 and this Court's Confidentiality Order.

Dated: May 11, 2015

Respectfully submitted,

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**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 11th day of May, 2015 to the following:

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