

EXHIBIT 6

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, et al.,)

Defendants.)

VIDEOTAPED DEPOSITION OF SHANTI SHUNN

April 24, 2015

1 BE IT REMEMBERED THAT, the videotaped deposition of
2 SHANTI SHUNN was reported by Bridget Montero, CSR No.
3 08-0408, on Friday, April 24, 2015, commencing at the
4 hour of 9:37 a.m., the proceedings being reported at
5 Stoel Rives LLP, 900 SW Fifth Avenue, Suite 2600,
6 Portland, Oregon.

7 APPEARANCES

8 BAJO CAVA COHEN TURKEL

9 By Mr. Shane B. Vogt

10 100 North Tampa Street, Suite 1900

11 Tampa, Florida 33602

12 and

13 HARDER MIRELL & ABRAMS LLP

14 By Mr. Charles J. Harder

15 1925 Century Park East, Suite 800

16 Los Angeles, California 90067

17 Appearing for Plaintiff

18
19 LEVINE SULLIVAN KOCH & SCHULTZ, LLP

20 By Mr. Michael Berry

21 1760 Market Street, Suite 1001

22 Philadelphia, Pennsylvania 19103

23 Appearing for Defendants

24
25 Also Present: Mick Irwin - Videographer

1 play counted as a view?

2 A. No. Again, not without having access to
3 their --

4 Q. Do you know whether the video had to play
5 for a certain length for this site to count it as a
6 view?

7 A. No, not having worked at CrazyShit.com.

8 Q. Can you tell from this the number of unique
9 views?

10 A. No.

11 Q. Can you tell how long people watched the
12 video?

13 A. No. But also couldn't tell how many people
14 were looking at the screen when this video was
15 playing, either.

16 So it's a similar aspect to did they
17 actually count unique views or did they count -- you
18 know, there's always -- there's going to be that
19 nebulous aspect of how many people stood behind the
20 computer when that video was actually played. It's
21 the same aspect.

22 Without actually being there on site, in
23 that person -- viewer's room, you can't tell if
24 there's four people watching that video or one person
25 watching that video. It's the same, without having

1 access to their back-end analytics code.

2 Q. But you also wouldn't know if it was
3 counting the same IP address, going loading -- you
4 know, I'm going to the website 14 times, whether that
5 counts as 14 views or one?

6 A. No. Again, I would not be able to confirm
7 their methodology on this without some back-end access
8 or access to an individual that actually coded that.

9 MR. BERRY: I'm going to mark this as
10 Exhibit 333.

11 (Exhibit 333 marked for identification.)

12 BY MR. BERRY: (Continuing)

13 Q. So the next website that's mentioned page 6
14 of your report is DailyMotion.com, which you mentioned
15 earlier.

16 A. Yes.

17 Q. And what Exhibit 333 is, I believe -- tell
18 me if this is right -- is the screenshot of the web
19 page you looked at that then you derived the source
20 code that's pasted into your report from, right?

21 A. Yes.

22 Q. Looking at Exhibit 333, when did you go to
23 this website?

24 A. It was about the exact same time as this
25 one, so late February, early March.

CERTIFICATE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

The State of Oregon)
SS.)
County of Multnomah)

I, BRIDGET MONTERO, CSR, CRR, RMR, a
Certified Shorthand Reporter for the States of Oregon
and California, hereby certify that said witness
personally appeared before me at the time and place set
forth in the caption hereof; that at said time and place
I reported in stenotype all testimony adduced and other
oral proceedings had in the foregoing matter; that
thereafter my notes were transcribed through
computer-aided transcription, under my direction; and
that the foregoing going pages constitute a full, true,
and accurate record of all such testimony adduced and
oral proceedings had, and of the whole thereof.

IN WITNESS WHEREOF, I have hereunto
set my hand and affixed my seal at Portland, Oregon,
this 29th day of April, 2015.



Bridget Montero

Bridget Montero, OR CSR No. 08-0408, CRR, RMR
CA CSR No. 10020