

**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.

_____ /

**CONFIDENTIAL SUPPLEMENTAL AFFIDAVIT OF
KENNETH G. TURKEL**

STATE OF FLORIDA

COUNTY OF HILLSBOROUGH

KENNETH G. TURKEL, Esq. being duly sworn, deposes and says:

1. I am a resident of Tampa, Florida over the age of 18 years. I am an attorney duly licensed to practice before all courts of the State of Florida, among other courts. I am a partner at the law firm Bajo Cuva Cohen Turkel, P.A., counsel for Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan. The statements made herein are based on my personal knowledge.

2. Attached hereto as Exhibit 41_C are true and correct confidential excerpts from the deposition testimony of Bubba the Love Sponge Clem.

3. Attached hereto as Exhibit 42_C are true and correct confidential excerpts from the deposition testimony of Terry Gene Bollea.

4. Attached hereto as Exhibit 43_C are true and correct confidential excerpts from the deposition testimony of David Houston.

5. Attached hereto as Exhibit 44_C are true and correct confidential excerpts from the deposition testimony of A.J. Daulerio.

6. Attached hereto as Exhibit 45_C are true and correct confidential excerpts from the deposition testimony of Heather Cole/Clem.

7. Attached hereto as Exhibit 46_C are true and correct confidential excerpts from the rough transcript of Leslie John's deposition testimony, which are being treated as confidential because the thirty day review period has not yet expired.

8. Attached hereto as Exhibit 47_C are true and correct confidential excerpts from the deposition testimony of Peter Horan, which are being treated as confidential because the thirty day review period has not yet expired.

9. Attached hereto as Exhibit 48_C is a true and correct copy of Campfire communications between Gawker staff members, previously produced as confidential documents GAWKER 01538_C-01568_C, which was previously marked as Deposition Exhibit 226A.

10. Attached hereto as Exhibit 49_C are true and correct copy of emails between A.J. Daulerio and Tony Burton, previously produced as confidential documents AJD 001_C-006_C.

11. Attached hereto as Exhibit 50_C is a true and correct copy of the confidential expert report of Jeff Anderson, which was previously marked as Deposition Exhibit 170

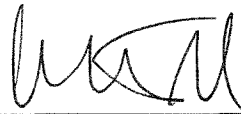
12. Attached hereto as Exhibit 51_C is a true and correct copy of a demand email sent by David Houston to Nick Denton, previously produced as confidential document BOLLEA 000453.

13. Attached hereto as Exhibit 52_C are true and correct copies of preservatons of non-Gawker websites that exhibited the Gawker-produced sex video, previously produced as confidential documents BOLLEA00459, 00461-62, 00464-67, 00470, 00472-73, 00478-84, 00488-94, 00500-01, 00604-05.

14. Attached hereto as Exhibit 53_C are true and correct copies of email communications between Terry Bollea and TNA Wrestling staff members, previously produced as confidential documents BOLLEA 001060-001067, and previously marked as Deposition Exhibit 91.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Executed this 11th day of May, 2015.



KENNETH G. TURKEL

Sworn to and subscribed before me this 11th day of May, 2015 by Kenneth G. Turkel who is personally known to me or _____ who has produced _____ (type of I.D.) as identification (check one)



(Signature)

Lisa H. Meriwether
(Type or Print Name)

Notary Public
My Commission Expires:
Commission No.:

