

**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.

**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 and Turkel P.A., counsel for Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan. The statements made herein are based on my personal knowledge.

1. Attached hereto as Exhibit A is a true and correct copy of an article entitled “These Topless Photos of Kate Middleton Put Us at Two for Three on Royal Nudie Pic Scandals [NSFW] (UPDATED)” previously produced as documents BOLLEA 000678-000681.

2. Attached hereto as Exhibit B is a true and correct copy of an article entitled “New York Post Outraged By These Hot Nude Pixxx” previously produced as documents BOLLEA 003114-003115.

3. Attached hereto as Exhibit C are true and correct copies of Facebook posts by Gawker.com previously produced as documents BOLLEA 005162-005165.

4. Attached hereto as Exhibit D are true and correct copies of two articles entitled “Many People Asked This Hulk Hogan Cosplayer About His Sex Tape This Weekend” and “Some Additional Notes About the Hulk Hogan Sex Tape We Should All Take Into Consideration As Things Fall Apart” previously produced as documents BOLLEA 000445-000447.

5. Attached hereto as Exhibit E is a true and correct copy of an article entitled “The Iron Sheik: Hulk Hogan Sex Tape Proves ‘He Have Grasshopper Dick’” previously produced as documents BOLLEA 000448-000450.


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6. Attached hereto as Exhibit F is a true and correct copy of an article entitled "The Worldwide Leader in Dong Shots" previously produced as documents BOLLEA 000682-000686

Executed this 22nd day of May, 2015.

  
\_\_\_\_\_  
KENNETH G. TURKEL

Sworn to and subscribed before me this 22<sup>nd</sup> 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.:

