

## **Exhibit 47\_C**

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 PETER HORAN

April 23, 2015

1 THE WITNESS: It's a little bit of a broad  
 2 statement, but sure, it's valuable.  
 3 BY MR. VOGT: (Continuing)  
 4 Q. It is a very low-cost advertising mechanism  
 5 for companies, correct?  
 6 **A. Yes. As part of an entire marketing mix,  
 7 it's a valuable tool.**  
 8 Q. I'm going to show you what was previously  
 9 marked as Exhibit 92. Have you ever seen this before?  
 10 **A. Yes.**  
 11 Q. Now, the top of this is a video box,  
 12 correct?  
 13 **A. Yep.**  
 14 Q. That would play the video when you clicked  
 15 on it?  
 16 **A. Yep.**  
 17 Q. There's a box underneath that -- it's blue.  
 18 Do you know what that box is?  
 19 **A. I'm sorry. Are you pointing here?**  
 20 Q. Yes.  
 21 **A. I believe that is a it's a social media  
 22 interaction box.**  
 23 Q. What's a social media interaction box?  
 24 **A. It's designed to make it easy for folks to  
 25 share this with their friends or indicate that they**

1 Q. It's dated October 4th of 2012. You  
 2 understand that to be the date that the Hogan post was  
 3 published by Gawker?  
 4 **A. I believe that is correct, yeah.**  
 5 Q. The top of this says, It's probably time  
 6 you watched this snippet from the Hulk Hogan sex tape  
 7 with a woman some claim is Bubba the Love Sponge's  
 8 wife. Work's over. You're fine.  
 9 And there's a link.  
 10 Now, that would be the text that Gawker  
 11 would post, correct?  
 12 MR. BERRY: Objection.  
 13 THE WITNESS: Yes.  
 14 BY MR. VOGT: (Continuing)  
 15 Q. Would you characterize that post as  
 16 inviting people to watch the Hogan sex tape?  
 17 MR. BERRY: Objection.  
 18 THE WITNESS: Yes.  
 19 BY MR. VOGT: (Continuing)  
 20 Q. Are you familiar with what Click Bait is?  
 21 MR. BERRY: Objection.  
 22 THE WITNESS: Yes.  
 23 BY MR. VOGT: (Continuing)  
 24 Q. Is Click Bait defined as a publisher  
 25 posting a link with a headline that encourages people

1 **like it on Facebook.**  
 2 Q. So if someone clicked the share box on  
 3 there, they would have a choice of sharing it on  
 4 Facebook or Twitter, those types of social networks?  
 5 **A. Yes.**  
 6 Q. And then there's also -- right underneath  
 7 the blue box, it says, Get our top stories. Follow  
 8 Gawker. Do you see that?  
 9 **A. Yes. Yep.**  
 10 Q. That would be a link where you would choose  
 11 to follow Gawker on various social media formats?  
 12 **A. Principally on Twitter, but yes.**  
 13 MR. VOGT: 311.  
 14 THE WITNESS: So we're done with this one  
 15 now?  
 16 (Exhibit 311 marked for identification.)  
 17 BY MR. VOGT: (Continuing)  
 18 Q. Yes. Handing you Exhibit 311. Have you  
 19 ever seen this before?  
 20 **A. I've not seen this, but I can't read Bubba  
 21 the Love Sponge without laughing.**  
 22 Q. We're very proud.  
 23 This is a printout of Gawker's Facebook  
 24 page, correct?  
 25 **A. Correct.**

1 to click to see more?  
 2 **A. I don't know if I'd say it's defined as,  
 3 but that's a good working definition, sure.**  
 4 Q. Would -- this Facebook post that we just  
 5 looked at, Exhibit 311, would that qualify as Click  
 6 Bait?  
 7 **A. Not really, but, like I said, I'm not --  
 8 Click Bait is typically things where it's more just  
 9 the headline: Like, you know, 57 Celebrity Tattoos  
 10 You've Never Seen Before, and you click it.  
 11 Because this is actually on their page with  
 12 the video box, it's a little different than classic  
 13 Click Bait, but it's certainly a promotional piece.**  
 14 Q. We had looked at the share box before in  
 15 Exhibit 92.  
 16 **A. Yeah.**  
 17 Q. If someone were to share this story from  
 18 Gawker.com, the Hogan post, when it came up on their  
 19 Facebook page, would it look similar to how it does on  
 20 Gawker's page, with the video showing?  
 21 MR. BERRY: Objection.  
 22 THE WITNESS: I would think so. I'm not  
 23 100 percent certain, but I would think so.  
 24 And, frankly, the question is because it's  
 25 NSFW, I don't know as if Facebook or Twitter would

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1 actually try to block it. They have some content  
 2 filtering along the way.  
 3 BY MR. VOGT: (Continuing)  
 4 Q. Well, if you look back at Exhibit 311, it  
 5 says right in the title that it's not safe for work,  
 6 so that probably would have been blocked if there was  
 7 a filter, right?  
 8 MR. BERRY: Objection.  
 9 THE WITNESS: Let me just say, might have  
 10 gotten through. I don't know if it would have gotten  
 11 through. It might have gotten through.  
 12 BY MR. VOGT: (Continuing)  
 13 Q. Have you heard of the term traffic whoring?  
 14 **A. No.**  
 15 **Traffic whoring?**  
 16 Q. Whoring.  
 17 **A. No.**  
 18 Q. Are you aware that A.J. Daulerio used that  
 19 word to describe what Gawker was doing in 2012?  
 20 MR. BERRY: Objection.  
 21 THE WITNESS: No.  
 22 BY MR. VOGT: (Continuing)  
 23 Q. Are you aware that in 2012, Mr. Daulerio  
 24 implemented a policy of requiring a staff member each  
 25 day to be assigned to traffic whoring duty?

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1 MR. BERRY: Objection.  
 2 THE WITNESS: No.  
 3 BY MR. VOGT: (Continuing)  
 4 Q. And that job entailed offering as many  
 5 posts as possible to garner the most traffic to the  
 6 site?  
 7 MR. BERRY: Objection.  
 8 THE WITNESS: No.  
 9 BY MR. VOGT: (Continuing)  
 10 Q. Are you aware that in 2012 Mr. Daulerio  
 11 wrote that at some point, a viral video becomes a  
 12 default hit switch for a slow news day?  
 13 MR. BERRY: Objection.  
 14 THE WITNESS: No.  
 15 BY MR. VOGT: (Continuing)  
 16 Q. Are you aware that Mr. Daulerio wrote that  
 17 a viral video is a necessary cog when your job is to  
 18 grow traffic?  
 19 MR. BERRY: Objection.  
 20 THE WITNESS: No.  
 21 BY MR. VOGT: (Continuing)  
 22 Q. We had looked before at the article,  
 23 Exhibit 308, when Mr. Denton said that --  
 24 MR. BERRY: Which one was that?  
 25 THE WITNESS: 308; the sideways one.

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1 BY MR. VOGT: (Continuing)  
 2 Q. 308; yeah, the sideways one.  
 3 **A. There it is. I got it.**  
 4 Q. In which he said, Over time I hope writers  
 5 will focus more of their energies on stories that have  
 6 the potential to break out on Twitter, Facebook, or on  
 7 TV coverage, and you agreed that that was viral  
 8 marketing?  
 9 **A. Yes.**  
 10 Q. Would you consider the Hogan post to be  
 11 viral marketing?  
 12 MR. BERRY: Objection.  
 13 THE WITNESS: The post itself is not viral  
 14 marketing. Efforts to get people to share it would be  
 15 viral marketing, but the post itself is just content.  
 16 BY MR. VOGT: (Continuing)  
 17 Q. So efforts to share through this box we  
 18 just looked at on Exhibit 92 would be viral marketing?  
 19 **A. Yeah.**  
 20 Q. The blue box that has the share button?  
 21 **A. Yes, that would be viral marketing.**  
 22 Q. You have a background in -- obviously, in  
 23 the advertising field, correct?  
 24 **A. Yep.**  
 25 Q. Generally, how much is an advertisement

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1 worth that would be guaranteed to bring 5 million  
 2 unique visitors to a website?  
 3 MR. BERRY: Objection.  
 4 THE WITNESS: Really, you don't buy  
 5 advertising -- like, you very rarely would buy  
 6 advertising to drive traffic. That's just not how you  
 7 do it.  
 8 BY MR. VOGT: (Continuing)  
 9 Q. But if you could, if you could buy an ad  
 10 that would guarantee to bring 5 million unique viewers  
 11 to your website, how much would that be worth?  
 12 MR. BERRY: Objection.  
 13 THE WITNESS: \$10,000.  
 14 BY MR. VOGT: (Continuing)  
 15 Q. And what are you basing that on?  
 16 **A. The revenue you derive from it.**  
 17 Q. And how do you know how much revenue you  
 18 would derive from 5 million unique visitors to a  
 19 website?  
 20 **A. That's the kind of calculation I went**  
 21 **through in my report. It's an estimate, but it's not**  
 22 **wildly off. It's how much traffic, how many pages do**  
 23 **they look at, what are those pages worth, what other**  
 24 **parts of the Gawker network did they go to.**  
 25 Q. Have -- any of the web media businesses