

EXHIBIT A – DEPOSITION OF ANDREW GORSTEIN (MARCH 3, 2015)

IN THE CIRCUIT COURT OF THE
SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

-----x
TERRY GENE BOLLEA, professionally known as HULK
HOGAN,

Plaintiff,

Case No. 12012447 CI-011

-against-

HEATHER CLEM, GAWKER MEDIA, LLC AKA GAWKER
MEDIA; GAWKER MEDIA GROUP, INC. AKA GAWKER
MEDIA; et al.,

Defendants.
-----x

March 3, 2015

2:12 p.m.

Videotaped Deposition of ANDREW GORENSTEIN,
pursuant to notice, at the offices of Merrill
Corporation, 1345 Avenue of the Americas, 17th
Floor, New York, New York, before Mark Richman,
a Certified Shorthand Reporter, Registered
Professional Reporter and Notary Public within
and for the State of New York.

1 ANDREW GORENSTEIN

2 are back on the record, the time is 16:55:21

3 4:55 p.m. 16:55:22

4 Q. What do you know about the 16:55:25

5 lawsuit of Terry Bollea versus Gawker 16:55:44

6 Media? 16:55:49

7 A. What I do know about it? I 16:55:49

8 know -- 16:55:50

9 MR. BERLIN: Excuse me. Let 16:55:51

10 me just interpose one caution which 16:55:52

11 is you should not reveal anything 16:55:54

12 you discussed with your counsel. 16:55:55

13 And then you can answer the 16:55:56

14 question. 16:55:57

15 A. I know that the company is 16:55:58

16 being sued. 16:55:59

17 Q. What knowledge do you have 16:56:01

18 that is relevant to the Terry Bollea 16:56:05

19 versus Gawker Media lawsuit? 16:56:07

20 MR. BERLIN: Objection. I'm 16:56:10

21 not sure the witness would know 16:56:12

22 what is relevant to the lawsuit, 16:56:15

23 but you may try and answer the 16:56:16

24 question if you can. 16:56:17

25 A. I don't know. 16:56:18

1 ANDREW GORENSTEIN

2 Q. What personal knowledge do you 16:56:18
3 have that is relevant to Terry Bollea's 16:56:21
4 claims against Gawker Media in that 16:56:24
5 lawsuit? 16:56:26

6 MR. BERLIN: Same objection. 16:56:26

7 A. Just to clarify, this is Hulk 16:56:33
8 Hogan, that's his name? 16:56:35

9 Q. Correct. 16:56:36

10 A. I don't know. 16:56:37

11 Q. What personal knowledge do you 16:56:39
12 have that is relevant to Gawker Media's 16:56:40
13 defenses asserted in that lawsuit? 16:56:43

14 MR. BERLIN: Same objection. 16:56:45

15 A. I don't know. 16:56:46

16 Q. Do you have personal knowledge 16:56:55
17 relating to the monetary value that 16:56:56
18 Gawker may have received in connection 16:56:58
19 with five million people going to 16:56:59
20 Gawker.com because the Hulk Hogan sex 16:57:03
21 tape was posted there? 16:57:07

22 MR. BERLIN: Same objection. 16:57:08

23 A. I don't know. 16:57:09

24 MR. HARDER: No further 16:57:21

25 questions. 16:57:22

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C E R T I F I C A T E

STATE OF NEW YORK)

: ss.

COUNTY OF NEW YORK)

I, MARK RICHMAN, a Certified
Shorthand Reporter, Certified Realtime Reporter
and Notary Public within and for the State of
New York, do hereby certify:

That ANDREW GORENSTEIN, the witness
whose deposition is hereinbefore set forth, was
duly sworn by me and that such deposition is a
true record of the testimony given by the
witness.

I further certify that I am not
related to any of the parties to this action by
blood or marriage, and that I am in no way
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 12th day of March, 2015.

Mark Richman

MARK RICHMAN, C.S.R., C.R.R.