

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

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Case No. 12012447 CI-011

Plaintiff,

vs.

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.

MOTION TO DETERMINE CONFIDENTIALITY OF COURT RECORDS

Pursuant to Rule 2.420 of the Florida Rules of Judicial Administration and this Court's Agreed Protective Order Governing Confidentiality, dated July 25, 2013 (the "Confidentiality Order"), Plaintiff, Terry Gene Bollea, by and through his undersigned counsel, hereby moves to determine the confidentiality of his Motion to Compel Full and Complete Financial Worth Discovery and Financial Worth Depositions. As grounds for this motion, Plaintiff states as follows:

1. Florida Rule of Judicial Administration 2.420(c)(9)(A)(iv) provides that certain court records are confidential if the Court determines that confidentiality is required in order to "obtain evidence to determine legal issues in a case."

2. This Court's Confidentiality Order provides that both the parties and non-party witnesses may designate testimony and/or documents as "confidential" if their substance falls into

certain enumerated categories. In addition, that order provides that all deposition testimony and transcripts shall be treated as “Confidential” for the first thirty (30) days after the release of the transcript, during which time the parties and the witness shall have the opportunity to review the transcript and to designate specific portions of the transcript as “Confidential.”

3. Concurrent with this Motion, Plaintiff is filing his Motion to Compel Full and Complete Financial Worth Discovery and Financial Worth Depositions, which refers to transcripts and other documents that have been produced during the discovery in this case and have previously been marked confidential by the parties or non-party witnesses.

4. Counsel for Plaintiff certifies that this motion is made in good faith and is supported by a sound factual and legal basis. Without in any way conceding that all of the deposition testimony and discovery documents that are referred to in the Motion to Compel Full and Complete Financial Worth Discovery And Additional Financial Worth Depositions have been properly designated as “Confidential” by the other parties or by the non-party witnesses making those designations, Plaintiff is filing this motion in compliance with Rule 2.420 and this Court’s Confidentiality Order.

WHEREFORE, Plaintiff respectfully requests that this Court determine the confidentiality of Motion to Compel Full and Complete Financial Worth Discovery and Financial Worth Depositions, including to treat as confidential only that testimony and those documents that are properly treated as such under Rule 2.420 and this Court’s Confidentiality Order.

Dated: June 22, 2015

Respectfully submitted,

/s/ Kenneth G. Turkel

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-Mail via the e-portal system this 22nd day of June, 2015 to the following:

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