

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;  
et al.

Defendants.

FILED  
ST. PETERSBURG  
2015 JUN 25 PM 4:08  
KEN BURKE  
CLERK OF CIRCUIT COURT

**ORDER GRANTING PUBLISHER DEFENDANTS'  
OBJECTIONS TO FINANCIAL WORTH DISCOVERY**

THIS CAUSE came before the Court for a Case Management and Status Conference on May 29, 2015, including, pursuant to the Court's oral pronouncement at the Case Management and Status Conference held on April 22, 2015, to address the scope of Plaintiff's financial worth discovery. The Court has reviewed the Court file, heard argument of counsel, and is otherwise fully advised in the premises. The Court FINDS as follows:

1. Pursuant to the parties' stipulation reached on the record at the April 22, 2015 Case Management and Status Conference, Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan ("Mr. Bollea") propounded financial worth discovery (the "Financial Worth Discovery Requests") on May 1, 2015, to Defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio (together, "Publisher Defendants").

2. On May 22, 2015, the Publisher Defendants sent a letter to Mr. Bollea's counsel memorializing their objections to the Financial Worth Discovery Requests. In addition to stating the Publisher Defendants' objections, the letter also included a list of items and information the Publisher Defendants were willing to produce in response to the Financial Worth Discovery

Requests (the “Agreed Upon Financial Worth Discovery”).

3. The Publisher Defendants provided the Court with a copy of the Financial Worth Discovery Requests and their May 22, 2015 letter on May 26, 2015. The Court heard argument of counsel on May 29, 2015.

IT IS ORDERED AND ADJUDGED, as follows:

1. The Court construes the Publisher Defendants May 22, 2015 letter stating their objections to be an *ore tenus* Motion for Protective Order to limit financial worth discovery to the Agreed Upon Financial Worth Discovery.

2. The *ore tenus* motion is **GRANTED**.

3. Pursuant to the agreement of counsel for the parties, the Publisher Defendants shall produce the following items by 5:00 p.m. on June 4, 2015:

A. The Publisher Defendants shall each produce non-privileged documents from the period of 2011 to the present sufficient to show, or constituting, the following:

1. The Publisher Defendants’ actual and estimated net worth;
2. Documents used in responding to financial worth interrogatories;
3. Bank statements (including the most recent and the end of each year back to 2011);
4. Brokerage/investment account statements (including the most recent and the end of each year back to 2011) and, to the extent not reflected therein, documents sufficient to show ownership of securities and interests in profit sharing arrangements, annuities or trusts;
5. Financial statements, including, for Gawker, balance sheets and income statements for year-end 2014 and through April 30, 2015 (since Gawker has previously produced prior years’ statements);
6. Accounts receivables;
7. Cash receipt journals;
8. Liabilities, debts, mortgages, and other obligations, including the terms thereof, whether assets have been pledged or otherwise encumbered to secure any debt or obligation;

9. Ownership interests in Gawker;
  10. Whether Gawker has been sold to, merged or consolidated with any other entity;
  11. SEC filings by Gawker;
  12. Federal income tax returns;
  13. Any interest held in any partnerships, LLCs, corporations, holding companies or other similar entities;
  14. Amounts of debts owed to the Publisher Defendants, including the amount of any rent or lease payments owed to them;
  15. The value of any ownership or leasehold interest in real property, including amounts and terms of leases;
  16. The Publisher Defendants' ownership of intellectual property and the amount of any income derived therefrom;
  17. Income of and compensation paid to Denton and Daulerio;
  18. Trusts in which either Denton or Daulerio has an interest; and
  19. Ownership of material assets (such as homes, vehicles, significant artworks, stocks, etc.) and the actual value thereof.
- B. The Publisher Defendants will respond to interrogatories requesting the following information:
1. That the Publisher Defendants swear to the authenticity of the financial documents provided;
  2. That they identify the amount of their financial worth;
  3. That they identify material assets and liabilities; and
  4. Whether Gawker, Denton, and Daulerio (a) maintain the right to bring any action against another person or entity to recover a debt and the amount thereof, and/or (b) are currently involved in such an action.

4. Mr. Bollea is granted an extension of the discovery deadline solely to complete the financial worth discovery authorized herein. However, this order granting the Publisher Defendants' *ore tenus* motion is without prejudice to Plaintiff's moving the Court for the production of additional documents and/or information following his review of the items

produced by Publisher Defendants on June 4, 2015, and following the financial worth  
depositions of each of the Publisher Defendants, scheduled to take place June 16-17, 2015.

JUN 23 2015

DONE AND ORDERED in Chambers at Pinellas County, Florida this \_\_\_\_ day of

\_\_\_\_\_, 2015.



PAMELA A.M. CAMPBELL  
CIRCUIT COURT JUDGE

Copies furnished to:  
Counsel of Record