

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

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

Case No. 12012447CI-011

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.

**PLAINTIFF TERRY BOLLEA’S OPPOSITION TO (AND STATEMENT OF *LIMITED*
NON-OPPOSITION TO) GAWKER DEFENDANTS’ MOTION *IN LIMINE* TO
EXCLUDE EVIDENCE RELATED TO THE HULK HOGAN “BRAND” (STYLED
“Publisher Defendants’ Motion *In Limine* to Exclude Evidence Related to Alleged Damages
Pertaining to the Hulk Hogan “Brand” And Purportedly Lost Business Opportunities”)**

Mr. Bollea successfully prevented discovery of his employment contracts and business dealings as an invasion of his financial privacy. Accordingly, Mr. Bollea does not oppose a limited *in limine* order excluding evidence supporting damages claims based on specific lost employment or business opportunities. The ruling should be **limited**, however, to claims of lost employment or business opportunities, which were the subject of the Court’s orders limiting such discovery.

To the extent Gawker Defendants are seeking an order precluding **a damages award on a right of publicity theory**, Mr. Bollea objects to such an order as overbroad and legally unsupported. Gawker Defendants were permitted to fully discover the basis for the damages that

Mr. Bollea is seeking at trial. The only area into which discovery was precluded was with respect to lost employment opportunities and business contracts. Thus, the scope of the *in limine* order should track the discovery rulings made by the Court pertaining to these areas, and state that evidence or argument pertaining to actual lost contracts or lost business opportunities should be excluded from trial.

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 25th day of June, 2015 to the following:

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