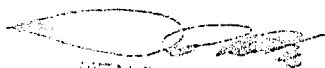


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IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

FILED
ST. PETERSBURG, FLORIDA
2015 JUN 30 PM 4: 34

KEN BURKE
CLERK OF CIRCUIT COURT

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

vs.

Case No. 12012447CI-011

HEATHER CLEM; GAWKER MEDIA, LLC;
et al.

Defendants.

**ORDER GRANTING DEFENDANTS GAWKER MEDIA, LLC'S, NICK DENTON'S,
AND A.J. DAULERIO'S
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. On May 1, 2015, Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan ("Mr. Bollea") propounded financial worth discovery to Defendants Gawker Media, LLC ("Gawker"), Nick Denton ("Denton"), and A.J. Daulerio ("Daulerio") (the "Financial Worth Discovery Requests"), pursuant to the parties' stipulation reached on the record at the April 22, 2015 Case Management and Status Conference.

2. On May 22, 2015, counsel for Defendants Gawker, Denton, and Daulerio 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

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Financial Worth Discovery Requests (the "Agreed Upon Financial Worth Discovery").

3. Counsel for Defendants Gawker, Denton, and Daulerio 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.

4. The parties stipulated during the May 29, 2015 conference to resolve Gawker's, Denton's, and Daulerio's objections as set forth below.

IT IS ORDERED AND ADJUDGED, as follows:

1. The Court construes the Defendants Gawker's, Denton's, and Daulerio's 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, Defendants Gawker, Denton, and Daulerio shall produce the following items by 5:00 p.m. Eastern Time on June 4, 2015:

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

1. Gawker's, Denton's, and Daulerio's 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;

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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 Gawker, Denton, and Daulerio , 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. Gawker's, Denton's, and Daulerio's 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. Gawker, Denton, and Daulerio shall each provide a sworn statement under oath attesting to the following:
1. The authenticity of the financial documents provided;
 2. The amount of their financial worth;
 3. The identification of 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.

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4. 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 Defendants Gawker, Denton, and Daulerio on June 4, 2015, and following the financial worth depositions of Gawker, Denton, and Daulerio, scheduled to take place June 16-17, 2015.

5. Mr. Bollea is granted an extension of the discovery deadline solely to complete financial worth discovery.

DONE AND ORDERED in Chambers at Pinellas County, Florida this 29 day of

June, 2015.



PAMELA A.M. CAMPBELL
CIRCUIT COURT JUDGE

Copies furnished to:
Counsel of Record