

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, *et al.*,

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"), Defendants Gawker Media, LLC, Nick Denton and A.J. Daulerio (collectively, the "Publisher Defendants"), by and through undersigned counsel, hereby move to determine the confidentiality of their Opposition to Plaintiff's Motion to Compel Additional Financial Worth Discovery, plus exhibits (the "Opposition"). As grounds for this motion, the Publisher Defendants state 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.

3. The Publisher Defendants have designated the financial worth discovery that they have produced as “Confidential” pursuant to that order, and the deposition transcripts containing testimony on that topic are within the 30-day review period provided by that order.

4. The Opposition summarizes the financial worth discovery and attaches portions of the deposition testimony. Consequently, the Opposition and the exhibits attached thereto are being treated as confidential.

5. Counsel for Gawker certifies that this motion is made in good faith and is supported by a sound factual and legal basis.

WHEREFORE, the Publisher Defendants respectfully request that this Court determine the confidentiality of their Opposition and exhibits attached thereto.

Dated: June 26, 2015

Respectfully submitted,

THOMAS & LOCICERO PL

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of June 2015, I caused a true and correct copy of the foregoing to be served via the Florida Courts' E-Filing Portal upon the following counsel of record:

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