

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.: 12012447-CI-011

vs.

GAWKER MEDIA,  
LLC aka GAWKER MEDIA; et al.,

Defendants.

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**PLAINTIFF'S FINANCIAL WORTH EXPERT DESIGNATION  
FOR PURPOSES OF PUNITIVE DAMAGES**

Plaintiff Terry Gene Bollea, by counsel and pursuant to Paragraph 12 of the Second Order Setting Pre-Trial Conference and Jury Trial, dated November 19, 2015, submits the following list of expert witnesses who are expected to testify concerning net worth solely for purposes of punitive damages at trial:

1. James J. Donohue  
c/o Charles J. Harder  
Harder Mirell & Abrams LLP  
1925 Century Park East, Suite 800  
Los Angeles, California 90067

Mr. Donohue is expected to testify at trial concerning Defendants, Gawker Media, LLC's and Nick Denton's, net worth solely for purposes of establishing ability to pay in connection with the amount of punitive damages: "a sum of money which, according to his financial ability, will hurt, but not bankrupt." *Hoy v. Poyner*, 305 So.2d 306, 307 (Fla. 2d DCA1974). This disclosure does not supplant or supersede Plaintiff's prior expert disclosures on other topics for other purposes.

Please refer to the accompanying Expert Report of James J. Donohue, at **Exhibit A**<sup>1</sup>, for the following: (1) the subject matter about which Mr. Donohue is expected to testify; (2) the substance of the facts and opinions about which Mr. Donohue is expected to testify; (3) a summary of the grounds for each of Mr. Donohue's opinions; (4) a copy of Mr. Donohue's qualifications, as well as citations to all cases in which he has testified at any deposition, hearing, or trial as an expert, going back three years; (5) the scope of Mr. Donohue's employment in the pending case; and (6) a list of all documents relied upon by Mr. Donohue in forming his opinions.

Copies of documents relied upon by Mr. Donohue, which are not pleadings in this case, transcripts of deposition testimony taken in this case, or documents previously produced by a party in this case, are being provided concurrently herewith via disk (sent via FedEx for next business day delivery).

Mr. Donohue's compensation in this case is the following: \$565 per hour.

Mr. Donohue has performed work for plaintiffs in approximately 50 percent of the cases where he has provided expert services, and has performed work for defendants in approximately 50 percent of cases. Mr. Donohue approximates the portion of his involvement as an expert witness as approximately 1/3<sup>rd</sup>, which is based on the percentage of hours he has served as an expert witness.

2. Any financial worth expert witnesses listed or otherwise identified by defendants Gawker Media LLC, A.J. Daulerio, and/or Nick Denton.
3. Any and all impeachment and rebuttal financial worth expert witnesses.

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<sup>1</sup> Exhibit A is being served on counsel for Gawker defendants, but is NOT being filed in the Court file because it relates to, incorporates and discloses matters designated by gawker defendants as "Confidential" pursuant to the Agreed Protective Order.

DATED: December 11, 2015

*/s/ Charles J. Harder*

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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 this 11th day of December 2015 to the following:

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