

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.

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**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 ("Gawker") and A.J. Daulerio ("Daulerio") (collectively, the "Publisher Defendants"), by and through undersigned counsel, hereby move to determine the confidentiality of their Opposition to Plaintiff's Motion *in Limine* No. 3 to Exclude Evidence or Argument Related to Settlement ("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. Plaintiff Terry Gene Bollea ("Hogan") designated the Settlement Agreement with former defendant Bubba Claim as "Confidential" pursuant to that order.

4. The Opposition attaches and summarizes the Settlement Agreement.

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. Without conceding that Plaintiff has properly designated the Settlement Agreement as “Confidential,” Gawker is filing this motion in compliance with Rule 2.420 and this Court’s Confidentiality Order.

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,

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By: /s/ Gregg D. Thomas

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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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