

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; 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.

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**TIMES PUBLISHING COMPANY'S MOTION TO INTERVENE  
FOR THE LIMITED PURPOSE OF OPPOSING CLOSURE OF  
JUDICIAL PROCEEDINGS AND RECORDS**

TIMES PUBLISHING COMPANY, by and through its undersigned counsel, moves to intervene in this action for the limited purpose of opposing closure of judicial proceedings and records. In support of this Motion, the Times states:

1. Times Publishing Company ("the Times") is the owner and publisher of Florida's largest daily newspaper of general circulation, the *Tampa Bay Times*, and its affiliated news website [www.tampabay.com](http://www.tampabay.com). The Times regularly relies on access to judicial proceedings and records to gather and report news of concern to the public.
2. Plaintiff herein has filed a Motion to Determine Confidentiality of Court Records and for Protective Order Excluding the Public and Press at Trial for Certain Evidence and Argument,

along with a number of other motions seeking closure of legal arguments and evidence filed with the court.

3. As a member of the news media, the Times has standing to intervene and be heard with respect to issues, motions and arguments affecting public access to court records and proceedings. *See Barron v. Florida Freedom Newspapers, Inc.*, 531 So.2d 113. 118 (Fla.1998). The Times opposes Plaintiff's requests for limitations on public access to this Court's proceedings and records, wishes to file a memorandum of law addressing the issues, and wishes to be heard through counsel concerning these matters.

WHEREFORE, Times Publishing Company respectfully requests that this Honorable Court enter an Order permitting it to intervene and be heard on the Plaintiff's motions to exclude the public and members of the news media from proceedings and records herein.

Respectfully submitted,

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*Attorneys for Intervenor  
Times Publishing Company*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 29<sup>th</sup> day of June, 2015 I caused a true and correct copy of the foregoing to be served via email upon the following counsel of record:

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