

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.

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

Defendants.

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**JOINT STIPULATION REGARDING THE AUTHENTICITY OF  
DOCUMENTS, AUDIO AND VIDEO FILES**

For purposes of summary judgment and trial, Plaintiff Terry Gene Bollea (“Mr. Bollea”) and Defendants Gawker Media, LLC, Nick Denton and A.J. Daulerio (collectively, “Defendants”) jointly stipulate that the documents, audio and video files identified in the affidavits attached hereto in **Exhibit A** are authentic. Mr. Bollea and Defendants further jointly stipulate that in the audio and video files listed at **Exhibit B**, the person who appears and/or whose voice is heard and who is identified as Terry Bollea and/or “Hulk Hogan” is Mr. Bollea. In addition, Mr. Bollea and Defendants jointly stipulate that in the audio and video files listed at **Exhibit C**, the person who appears and/or whose voice is heard and who is identified as Nick Denton is defendant Nick Denton; and that in the audio and video file listed at **Exhibit D**, the person who appears and/or whose voice is heard and who is identified as John Cook is John Cook. This stipulation is based on the parties’ reliance on affidavits provided by counsel which, among other things, provide that the documents, audio and video files are true and correct copies of what they purport to be and have not been altered in any way from the original document or file.

The parties reserve their right to withdraw this stipulation as to any particular document, audio or video file if the party later discovers evidence that the copy or original of the document, audio or video file is not authentic, provided the party notifies the other party and the Court promptly after discovering that evidence. Under such circumstances, the parties agree that discovery may be re-opened for the limited purpose of authenticating the questioned document, audio or video file.

None of the parties will contest the authenticity of any document that he or it produced in connection with the above-captioned litigation.

This stipulation is only as to the authenticity of the documents, audio and video files, and the parties reserve all objections as to the admissibility of the documents, audio and video files on any other basis.

Dated: June 26, 2015

Respectfully submitted,

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THOMAS & LOCICERO PL

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this \_\_\_ day of June, 2015, I caused a true and correct copy of the foregoing to be served electronically upon the following counsel of record at their respective email addresses via the Florida Courts E-Filing Portal:

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