

EXHIBIT R

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

IN THE CIRCUIT COURT OF THE  
SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA

Case No. 12012447CI-011

-----)  
TERRY GENE BOLLEA professionally  
known as HULK HOGAN,

Plaintiff,

vs.

HEATHER CLEM, GAWKER MEDIA, LLC a/k/a  
GAWKER MEDIA, GAWKER MEDIA GROUP, INC.  
a/k/a 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 a/k/a GAWKER MEDIA,

Defendants.  
-----)

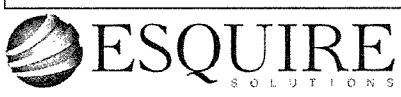
VIDEOTAPED DEPOSITION OF

ALBERT JAMES DAULERIO

New York, New York

Monday, September 30, 2013

Reported by:  
Toni Allegrucci  
JOB NO. 337256



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

A.J. Daulerio

itself before your story, correct?

A. Not to my knowledge.

Q. And so what you wanted to do is to run the NSFW footage, that was the whole point of the story, correct?

MR. BERLIN: Objection.

You can go ahead and answer.

A. Okay. No, the whole point of the story was to, A, prove its existence and, B, for me to commentate on what I witnessed of that tape.

Q. But you never considered running a story with just your commentary?

MR. BERLIN: Objection, asked and answered.

You can answer.

A. The story as it pertains to this tape, no.

Q. Okay. And if you had done that the number of page views and unique visitors would have been far less than what it actually was, correct?

MR. BERLIN: Objection, calls for speculation. You can answer if you can.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

A.J. Daulerio

Q. Was the news hook here with respect to this story, the Hulk Hogan sex tape story, was the true news hook that Hogan was taped having sex with his best friend's wife?

A. I wouldn't say that was particularly the true news hook.

Q. What was the news hook?

A. The news hook was essentially what I stated in the headline itself which was my own personal commentary about the Hulk Hogan sex tape that was in existence and me watching it.

Q. With respect to the story and its news value, does it matter what position Hulk and Heather, Hulk Hogan and Heather Clem were having sex in?

A. In terms of its news value?

Q. Yes.

A. I don't think so.

Q. Does it matter what his penis looked like?

A. In terms of news value?

Q. Yes.

A. I don't think so.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

A.J. Daulerio

Q. Would it have been any more or less of a story if he had been on top of her instead of her being on top of him?

A. Not, not, not to me.

Q. And would it have been any more or less of a story if his penis had been other than what it appeared to be?

A. Not to me.

Q. So then can you tell me what the news value was, if any, of showing any explicit footage?

MR. BERLIN: Asked and answered.

You can answer.

A. Yeah. As I stated before, I mean, it was the, the excerpts were picked more for length and duration and kind of to basically coincide with the commentary I was offering about the tape and to show some of the things that I had pinpointed as stuff that I was interested in discussing.

Q. Did you have concerns that readers wouldn't believe your description of the sex tape without seeing the actual video?

A. I don't know if it was necessarily