

EXHIBIT A
to
GAWKER DEFENDANTS' REQUEST FOR HEARING

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

TERRY GENE BOLLEA, professionally
known as HULK HOGAN,

Plaintiff,

vs.

Case No. 12-012447-CI-011

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

Defendants.
_____ /

HEARING BEFORE THE HONORABLE PAMELA A.M. CAMPBELL

Case Management and Status Conference

DATE: July 30, 2015

TIME: 10:00 a.m. to 11:48 a.m.

PLACE: Pinellas County Courthouse
545 First Avenue North
Third Floor, Courtroom C
St. Petersburg, Florida

BEFORE: Valerie A. Hance, RPR
Notary Public, State of
Florida at Large

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APPEARANCES:

CHARLES J. HARDER, ESQUIRE (via telephone)
Harder Mirell & Abrams, LLP
1925 Century Park East
Suite 800
Los Angeles, California 90067

- and -

DAVID R. HOUSTON, ESQUIRE (via telephone)
Law Office of David R. Houston
432 Court Street
Reno, Nevada 89501

- and -

KENNETH G. TURKEL, ESQUIRE
SHANE B. VOGT, ESQUIRE
Bajo Cuva Cohen & Turkel, P.A.
100 North Tampa Street
Suite 1900
Tampa, Florida 33602
Attorneys for Plaintiff

CONTINUED:

1 APPEARANCES CONTINUED:

2 SETH D. BERLIN, ESQUIRE
3 Levine Sullivan Koch & Schulz, LLP
4 1899 L Street, N.W.
5 Suite 200
6 Washington, D.C. 20036

7 - and -

8 MICHAEL BERRY, ESQUIRE
9 Levine Sullivan Koch & Schulz, LLP
10 1760 Market Street
11 Suite 1001
12 Philadelphia, Pennsylvania 19103

13 - and -

14 HEATHER DIETRICK, ESQUIRE
15 General Counsel
16 Gawker Media
17 210 Elizabeth Street
18 Third Floor
19 New York, New York 10012

20 - and -

21 GREGG D. THOMAS, ESQUIRE
22 Thomas & LoCicero PL
23 601 South Boulevard
24 Tampa, Florida 33606
25 Attorneys for Defendant
Gawker Media, LLC

ALSO PRESENT:

Terry Gene Bollea

P R O C E E D I N G S

(Court called to order at 10:00 a.m.)

1 THE COURT: So we're here in Case No.
2 12-012447, Bollea vs. Gawker and others. We're here
3 this morning for the plaintiff's emergency motion
4 for clarification and confirmation that the agreed
5 protected order and stipulated protocol govern all
6 documents, reference and materials, produced in
7 response to the Freedom of Information Act request
8 of Gawker Media, LLC, and its' attorneys request for
9 status conference. We're also here today for a case
10 management conference. I would like to be able to
11 schedule the trial in this matter.
12

13
14 And at this point in time, is there anything --
15 who is going to be arguing that motion, Mr. Turkel?

16 MR. TURKEL: Your Honor, we have three motions
17 pending. The first one you mentioned, the emergency
18 motion for clarification on the protocol.

19 And may it please the Court, Judge. And good
20 morning.

21 The plaintiffs noticed an action is at issue,
22 and motion to grant priority status and to set the
23 case for trial, and the emergency motion we filed
24 for leave to conduct discovery on a potential
25 violation of protective order in this case by the

1 defendants.

2 Mr. Vogt will be handling the set the cause for
3 trial motion and the clarification of the protocol.
4 I'm going to handle the discovery motion.

5 THE COURT: All right. Thank you. Which would
6 you like to do first?

7 MR. TURKEL: Judge, we'll take them in any
8 order which the Court deems appropriate. The
9 headiest of the three is probably the motion for
10 leave to conduct discovery. It implicates the most
11 issues.

12 It sounds to me, by noticing this for case
13 management, that we intend to walk out of here with
14 a trial date anyway, and so, really, that motion
15 seems to somewhat have been addressed by the Court
16 by that statement.

17 So if it please the Court, I think probably
18 taking that first will be the best order of things.

19 THE COURT: Go ahead.

20 MR. TURKEL: Judge, it's been a volatile few
21 weeks since we were last in front of you.
22 Understanding we were on the doorstep of trying this
23 case and the case got continued at the last minute,
24 I'm sure to no one's benefit, in the sense that we
25 were all working hard to get ready, including this

1 sideshow, the circus that Gawker seems to want to
2 attempt and bait into this courtroom doesn't become
3 the focus of it, but it focuses on the assertion of
4 those rights and their defenses.

5 And, Judge, we have rules in this game. And we
6 agree, when we take the oath, to abide by those
7 rules. And we will disagree all day, until the jury
8 or judge comes back, on whether my client's privacy
9 rights supercede their asserted First Amendment
10 right. And that's what we're here to try. It's
11 never been any different. And I know the Court
12 knows that, because we spent nine hours vetting the
13 legal issues in this case on summary judgment and
14 you entered your order on that.

15 And, you know, we agree to abide by these rules
16 and we agree to play by them. And you call the
17 balls and the strikes and you make your judgments as
18 a judge and we live with them. And if we don't like
19 them, that's what we do. And then we try the case
20 and appeal it if we don't like it. And I think
21 that's a pretty succinct version of how it's
22 supposed to work in our system.

23 Judge, we have put before you -- and I don't
24 know -- we obviously filed this on an emergent
25 basis. I don't know if the Court had a chance to

1 read this motion yet on the discovery issue.

2 THE COURT: I haven't even seen it.

3 MR. TURKEL: Do we have a courtesy copy, Shane?

4 Judge, I'm going to hand you, if I may
5 approach, a courtesy copy without the voluminous
6 exhibits, which we can hand you also, but I think it
7 will be easier right now to use the motion itself
8 and the incorporated timeline as a point of
9 reference.

10 And so, Judge, I really am starting at point
11 zero. I'm going to try, because I know to the
12 extent the Court has not read that, the Court will
13 read it, because you read everything and you have
14 throughout this case.

15 Judge, to sort of cut to the chase on the
16 predicate for the motion, for the last two and a
17 half years or so, Gawker has tried throughout this
18 case, both in discovery, both in front of
19 Judge Case, your appointed discovery master, and in
20 this Court, to inject issues relating to a separate
21 tape that is at -- than the one that is at issue in
22 this case, that they've alleged contains offensive
23 language engaged in by my client. They've tried.
24 They've tried at depositions. I've sat there and watched
25 them try and watched Judge Case stop them time and

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REPORTER'S CERTIFICATE

STATE OF FLORIDA

COUNTY OF HILLSBOROUGH

I, Valerie A. Hance, Registered Professional Reporter, certify that I was authorized to and did stenographically report the foregoing proceedings and that the transcript is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the outcome of the foregoing action.

Dated this 30th day of July, 2015, IN THE CITY OF TAMPA, COUNTY OF HILLSBOROUGH, STATE OF FLORIDA.

Valerie A. Hance, RPR