

**CONFIDENTIAL**  
**EXHIBIT 19-C**

to the

**JOINT OPPOSITION OF THE GAWKER DEFENDANTS AND THEIR  
COUNSEL TO PLAINTIFF'S EMERGENCY MOTION TO CONDUCT  
DISCOVERY CONCERNING POTENTIAL VIOLATION OF  
PROTECTIVE ORDER, TO COMPEL TURNOVER OF CONFIDENTIAL  
DISCOVERY MATERIALS AND FOR ORDER TO SHOW CAUSE**

## EXHIBIT B TO SETTLEMENT AGREEMENT

- Three Reels

- 1<sup>st</sup> dated 7-3-07;
- 2<sup>nd</sup> dated 7-13-07
- 3<sup>rd</sup> undated

- FIRST TAPE

- 43:06 in length
- Residential bedroom – four poster bed
- Starts out with g-string female embracing clothed DOE
- 0:09 – [redacted] enters walks in
  - DOE – Good grie [redacted]
  - [redacted] Isn't she beautiful
  - 1:16 – [redacted] puts music on – female gets on bed wearing only a thong & black pumps. DOE takes his shirt off
  - 1:15 – [redacted] walks back in – DOE says wow – this is my Christmas present - [redacted] responds I'm going to take a shower
  - 2:29 – DOE standing on floor – femal begins performing oral sex on him. Penis is not visible as DOE's back is facing camera. Continues thru 4:48
  - 4:48 – Hogan turns to camera with erect penis where female continues to perform oral on DOE as he lays on his back.
  - [redacted] enters – OK I'm going to be in my office watching lookout. Female responds OK - Continues blowing DOE
  - 10:16 – DOE breathing heavy Oh Fuck Im gonna cum oh fuck – suck my dick breathing heay moans, orgasms. Female continues more slowly
  - 11:48 – DOE says oh thank you. Female continues hear kissing sounds as she kisses his penis
  - F asks if DOE likes her shoes – yes
  - F asks if she can turn shower on for him – yes
  - DOE gets up shakes his head & leaves the room.
  - 14:30 Female enters wearing nighty & no shoes – gets dressed gets on bed
  - DOE reenters naked – F states – all three of us have to go away on a vacation – DOE says no shit...F or else just hang out here for a week
  - 15:48 – F asks about tension in DOE's family – DOE continues that it was a slap in the face for him to be at a hotel but his family at his house
  - DOE – there was all these things that added up...its not like she's leading me on...thanksgiving only daughter leaves. . .
  - F remains cuddling in bed

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- DOE – wife is trying to establish residency in L.A...
    - 18:15 – Im just a dumb country bumpkin – my career is over & this is what I have to look forward to
    - 19:00 – F tells story about trying to park car in a mall – God will reward those who do the right thing
    - 20:00 – F - you don't have to be anybodies doormat
    - DOE getting dressed
    - 21:16 F answers phone --
    - 22:00 both leave room
    - 39:00 F enters – blows out candles – leaves at 40:00
    - 43:06 end of tape
- SECOND TAPE 7-13-07
  - 30:17 in length
  - Same Residential bedroom – four poster bed
  - Starts out with DOE performing oral sex on F
    - She is moaning
    - [redacted] says – hey you guys do your thing – I'll be in the office
    - 0:38 – F-I want you to fuck the shit out of me today
    - DOE I'm so horny – I can't believe I'm here – I should be home
    - 1:34 – DOE standing -- F laying on stomach on bed performing oral on DOE while he reaches around fingering her -- she is loud
    - Sounds of oral sex go thru 4:40 where DOE says You go ...suck my dick
    - 5:00 DOE – do you have a rubber
    - F opens a drawer gets a rubber but continues giving oral before she puts it on the standing DOE. DOE full frontal – facing camera
    - 6:40 DOE slides onto his back in bed – she gets on top – intercourse -- loud. Kissing.
    - 7:28 – DOE begins smacking F's ass – she is loud – your big dick is so great –
    - 8:21 LOUD F - I'm cumming – fuck ya – give it to me
    - 8:50 DOE --orgasm.
    - 9:25 – DOE -- okaaay -- it almost came off. F leaves room
    - 10:20 – DOE – I cant believe I have to drive back home --
    - F returns to a spent DOE - would you like me to turn the shower on for you
    - 10:30 – DOE I can't believe I just ate – I feel like a pig
    - 12:35 -- naked F reenters – crawls into bed.
    - 13:27 – DOE reenters -- look at you ...you are out all cuddly --
    - DOE getting my [redacted] hirt back on...crazy...eating like a pig 10 minutes ago
    - 14:20 DOE gets dressed...feel like I just got off a rollercoaster
    - 15:00 [redacted] she has a killer fucking body.
      - The other night [redacted] s out & the dog's are plaing tug of war with [redacted] .ther [redacted] has another girl

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who is even hotter in Orlando – then she wants to be 1<sup>st</sup> to get me if I'm divorced. (from gawker)...hot commodity

- 18:30 I got in trouble at OZ – coast guard guys – they give him a bracelet. Buy each other beers. Then they buy a yeagermeister. They challenge DOE to fight. I fight these four mutherfuckers.
  - They fucked with my car. They put a lit cigarette in my gas tank.
  - Fuck this – I don't care if it is on the front page of the USA today – go back to OZ – get security footage – they piss on car – scratch car – to make a long story short – cab driver – interviewed by cops.
  - At 4AM police arrest the 4 guys -
- 23:10 – O [ ] but you are awesome – F- so are you
- 30:11 – tape ends

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• TAPE 3 – UNDATED

- 50:03 IN LENGTH
- Residential bedroom – four poster bed
- Starts out with voices of [ ] DOE & F talking
- [ ] excuses himself
  - F talks about off-road biking – nobody in frame
  - 2:07 enter F & DOE clothed.
  - DOE removes her top
  - DOE takes off his [ ] shirt
  - They get on bed
  - 3:06 – DOE this is some weird shit. F says I guess so – just roll with it
  - 3:56 – F turns DOE around he is facing camera and she performs oral as he sits on edge of bed.
  - 6:00 DOE lays back in bed as she goes nuts giving oral.
  - 6:55 DOE puts condom on
  - 7:30 DOE performs oral
  - 8:00 DOE intercourse
    - F it feels so good
    - F – fuck me so good.
    - F – oh you are so big – Loud
    - F – let me get on top of you
    - DOE continues
    - 9:15 F – oDOEH im gonna cum loud
  - 10:00 F – oh you gotta stop – you are killing me – your dick is so big – DOE slows down
  - 11:00 F leaves – DOE remains on back naked in bed
  - 11:50 she returns – washes DOE's penis
  - 12:50 the couple cuddles – naked on bed
  - 13:30 F – I'm a little worried about you
  - 14:00 – F you know you can come over here whenever you want & chill out – DOE – I appreciate that

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- 17:09 – DOE I should probably try to head home & try and beat [redacted] home. There is so much BS in my life, I want to try & not loose everyone.
- 17:30 I feel bad for [redacted] – she is making some real bad decisions now.
- 18:20 F would you like to take a shower? – DOE – that would be cool – let me rinse off real quick.
- 19:40 – both leave room
- 20:34 F returns clothed – goes to nightstand leaves again
- 21:00 F makes bed
- 22:00 small talk re furniture, etc.
- 22:52 – DOE puts [redacted] shirt on
- 23:20 DOE MTV called my wife & said they were going to sue her. My wife texted me to say Happy Father's day because she won't talk on the phone anymore.
- 24:00 [redacted] enters – (the three of them are now in the room). DOE talking about wife's contractual issues with MTV.
- 25:00 – DOE [redacted] you better get off your ass & get your mom in gear. I understand having an edge – I know how to work a gimmick.
- 26:22 [redacted] talking about [redacted] you should go on Oprah, Ellen, etc.
- 27:00 – DOE talking about [redacted] fucking up MTV show
- 27:55 – DOE – my daughter [redacted] jumped sides on me. I spent 2-3 M on her music. I've done everything like a jackass for her.
- [redacted] those fuckers don't realize if the old man (DOE) cuts bait...
- 28:40 The one option [redacted] had - [redacted] career besides me is South Beach Records – Billionaire guy – I don't know if [redacted] was fucking the guy's son... whatever... I mean I know what is going on – I mean I don't have double standards – I mean I'm a to a point. Fucking [redacted]. But then when it comes to nice people and shit whatever. I mean I'd rather if she was gonna fuck a [redacted] – I'd rather have her marry an 8 foot tall 100M basketball player.
- F – We all are a little bit.
- DOE – [redacted] fucking [redacted] – he had [redacted] coming in on the 22<sup>nd</sup> track... I didn't even tell [redacted] about it. Fuck her.
- 30:54 DOE – [redacted] & [redacted] meet in Miami - [redacted] fucks up a 10M deal I had with the Saudis - [redacted] says Fuck You [redacted] She's never said that, she flipped a bird at me.
- 32:00 DOE -- I have this huge fucking home in Miami. My family never came home. They went to LA -- fuck em
- 34:00 – MTV programming – ad buys - [redacted] fucking quit. And she tried to put it on me.
- 35:00 -- DOE [redacted] was pissed because "I didn't set her up" WTF – thankless.
- 36:00 [redacted] is fucking nuts. She wants to duplicate our FL house in LA – she is fucking crazy.

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REDACTED

- 36:55 – Palms place in Vegas – I bought it for 4.25 – it is worth 5M. If I get divorced - [REDACTED] will make me sell it. But fuck it - [REDACTED] will buy it and give it back to me after the divorce.
- 38:00 DOE – you can think whatever the fuck you want about me but I will never give [REDACTED] the opportunity again to publicly disrespect me b/c I don't trust her.
- 38:50 [REDACTED] ODOE I have something for you – whose your [REDACTED] – check it out. (Oakley inscribed glasses).
- 40:30 DOE – dude the only thing I'll ask you & I don't know how you'll pull this off is – If Im ever on my death bed don't let [REDACTED] come & see me.
- 41:00 [REDACTED] & Wife then give DOE a thank you card to LDOE to give to [REDACTED] for the wedding.
- 42:00 DOE - VH-1 – wanted me to do a big thing go back to the house I grew up in -- so we knock on the door & a big [REDACTED] lives there now. The half [REDACTED] was enamored with [REDACTED]
- 43:38 DOE – to F . I love you baby [REDACTED] & DOE leave F in bed.
- 49:00 – [REDACTED] re-enters & says - if we ever did want to retire, all we have to do is use that fucking footage of him talking about people
- 49:45 - [REDACTED] - I want to watch the tape.
- F - his dick hurt so fucking bad – you'll probably just see my face squirming – I just tried to get past the pain to enjoy it
- 50:03 – tape ends

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