

EXHIBIT 15

to the

**THE GAWKER DEFENDANTS' MOTION TO DISMISS
ON THE GROUNDS OF FRAUD ON THE COURT**

EXHIBIT B TO SETTLEMENT AGREEMENT

- Three Reels
 - 1st dated 7-3-07;
 - 2nd dated 7-13-07
 - 3rd 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 grief Bubba
 - [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

b6 -2
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- * DOE – wife is trying to establish residency in LA...
- * 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

- o 30:17 in length
- o Same Residential bedroom – four poster bed
- o 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 -- okaaaay -- 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 bubba shirt 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

b6 -2, 4
b7C -2, 4

who is even hotter in Orlando – then she wants to be 1st 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 [redacted] but you are awesome – F- so are you
- 30:11 – tape ends

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b7C -2, 4

• TAPE 3 – UNDATED

- 50:03 IN LENGTH
- Residential bedroom – four poster bed
- Starts out with voices of [redacted] DOE & F talking
- [redacted] 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 [redacted] 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

b6 -2
b7C -2

- 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 Bubba 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 22nd 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

b6 -2, 4
b7C -2, 4