

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

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

vs.

Case No. 12012447CI-011

GAWKER MEDIA, LLC, *et al.*,

Defendants.

**MOTION TO DETERMINE CONFIDENTIALITY OF DEFENDANTS'
SUPPLEMENTAL BRIEF RE: DEFENDANTS' MOTION TO PRECLUDE PLAINTIFF
FROM CALLING THEIR RETAINED EXPERT KEVIN D. BLATT AS A WITNESS**

Pursuant to Rule 2.420 of the Florida Rules of Judicial Administration and this Court's Agreed Protective Order Governing Confidentiality, dated July 25, 2013 (the "Protective Order"), Defendants Gawker Media, LLC ("Gawker"), Nick Denton, and A.J. Daulerio hereby move to determine the confidentiality of their Supplemental Brief Regarding Defendants' Motion to Preclude Plaintiff from Calling Their Retained Expert Kevin D. Blatt as a Witness ("Supplemental Brief Regarding Blatt"), and the Exhibits attached thereto.

As grounds for this motion, Defendants state as follows:

1. Florida Rule of Judicial Administration 2.420(c)(9)(A)(iv) provides that certain court records are confidential if the Court determines that confidentiality is required in order to "obtain evidence to determine legal issues in a case."

2. This Court's Protective Order provides that both the parties and non-party witnesses may designate testimony and/or documents as "Confidential" if their substance falls into certain enumerated categories.

3. Concurrent with this Motion, Defendants are filing their Supplemental Brief Regarding Blatt, and the Exhibits attached thereto, which refer to and include documents designated as “Confidential” by a non-party witness in accordance with the Protective Order.

4. Counsel for Gawker certifies that this motion is made in good faith and is supported by a sound factual and legal basis.

WHEREFORE, Defendants respectfully request that this Court determine the confidentiality of their Supplemental Brief Regarding Blatt and the Exhibits attached thereto.

February 1, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of February, 2016, I caused a true and correct copy of the foregoing to be served via the Florida Courts' E-Filing Portal on the following counsel of record:

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