

Exhibit 1

to the

**DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION *IN LIMINE* NO. 23:
TO EXCLUDE, OR ALTERNATIVELY, TO STRIKE, ARGUMENTS OR
EVIDENCE SUBMITTED TO SHOW FRAUD ON THE COURT**

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.: 12012447-CI-011

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

Defendants.

**STIPULATION REGARDING PLAINTIFF'S
MOTION TO STRIKE AFFIRMATIVE DEFENSES**

Plaintiff Terry Bollea, professionally known as Hulk Hogan, and Defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio (hereinafter, "Gawker Defendants"), jointly stipulate as follows:

1. On July 17, 2015, Gawker Defendants filed Amended Answers pleading affirmative defenses that Plaintiff's claims allegedly are barred by (a) Florida Statutes § 768.295 as amended (hereinafter, the "anti-SLAPP statute") and (b) as a result of an alleged ongoing pattern of fraud on the court. *See* Gawker Defendants' Amended Answers, Defenses ¶¶ 22, 23.

2. On October 30, 2015, Plaintiff filed a Motion to Strike Affirmative Defenses seeking to strike those purported defenses from Gawker Defendants' Amended Answers.

3. Gawker Defendants hereby withdraw Paragraphs 22 and 23 of the Defenses listed in their Amended Answers, and Plaintiff hereby withdraws his Motion to Strike Affirmative Defenses.

4. This Stipulation does not affect the alleged merits of, or any arguments concerning, any issues relating to the anti-SLAPP statute or any claims alleging "fraud on the court," including without limitation Gawker Defendants' ability to bring motions relating to

{BC00077882:1}

same and does not affect Plaintiff's ability to raise any arguments in opposition to any such motion(s).

Dated: November 13, 2015

Respectfully submitted,

BAJO CUVA COHEN & TURKEL, P.A

THOMAS & LOCICERO PL

By: /s/ Kenneth G. Turkel
Kenneth G. Turkel, Esq.
Florida Bar No. 867233
Shane B. Vogt, Esq.
Florida Bar No. 25760
100 North Tampa Street, Suite 1900
Tampa, FL 33602
Telephone: (813) 443-2199
Fax: (813) 443-2193
kturkel@bajocuva.com
svogt@bajocuva.com

By: /s/ Gregg D. Thomas
Gregg D. Thomas
Florida Bar No.: 223913
Rachel E. Fugate
Florida Bar No.: 0144029
601 South Boulevard
P.O. Box 2602 (33601)
Tampa, FL 33606
Telephone: (813) 984-3060
Facsimile: (813) 984-3070
gthomas@tlolawfirm.com
rfugate@tlolawfirm.com

Charles J. Harder
Pro Hac Vice Number: 102333
Douglas E. Mirell
Pro Hac Vice Number: 109885
Jennifer J. McGrath
Pro Hac Vice Number: 114890
HARDER MIRELL & ABRAMS LLP
132 S. Rodeo Drive, Suite 301
Beverly Hills, CA 90212
Telephone: (424) 203-1600
Fax: (424) 203-1601
charder@hmafirm.com
dmirell@hmafirm.com
jmcgrath@hmafirm.com

Seth D. Berlin
Pro Hac Vice Number: 103440
Michael Sullivan
Pro Hac Vice Number: 53347
Michael Berry
Pro Hac Vice Number: 108191
Alia L. Smith
Pro Hac Vice Number: 104249
Paul J. Safier
Pro Hac Vice Number: 103437
LEVINE SULLIVAN KOCH & SCHULZ, LLP
1899 L Street, NW, Suite 200
Washington, DC 20036
Telephone: (202) 508-1122
Facsimile: (202) 861-9888
sberlin@lskslaw.com
msullivan@lskslaw.com
mberry@lskslaw.com
asmith@lskslaw.com
psafier@lskslaw.com

Counsel for Plaintiff Terry Gene Bollea

*Counsel for Defendants Gawker Media, LLC,
Nick Denton and A.J. Daulerio*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of November, 2015, 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:

Barry A. Cohen, Esquire
Michael W. Gaines, Esquire
The Cohen Law Group
201 E. Kennedy Blvd., Suite 1950
Tampa, Florida 33602
bcohen@tampalawfirm.com
mgaines@tampalawfirm.com
jhalle@tampalawfirm.com
mwalsh@tampalawfirm.com
Counsel for Heather Clem

David R. Houston, Esquire
Law Office of David R. Houston
432 Court Street
Reno, NV 89501
dhouston@houstonatlaw.com
krosser@houstonatlaw.com
Michael Berry, Esquire
Levine Sullivan Koch & Schultz, LLP
1760 Market Street, Suite 1001
Philadelphia, PA 19103
mberry@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

Timothy J. Conner
Holland & Knight LLP
50 North Laura Street, Suite 3900
Jacksonville, FL 32202
timothy.conner@hklaw.com

Charles D. Tobin
Holland & Knight LLP
800 17th Street N.W., Suite 1100
Washington, D.C. 20006
charles.tobin@hklaw.com
*Attorneys for Intervenors, First Look Media, Inc.,
WFTS-TV and WPTV-TV, Scripps Media, Inc.,*

Gregg D. Thomas, Esquire
Rachel E. Fugate, Esquire
Thomas & LoCicero PL
601 S. Boulevard
Tampa, Florida 33606
gthomas@tlolawfirm.com
rfugate@tlolawfirm.com
kbrown@tlolawfirm.com
abeene@tlolawfirm.com
Counsel for Gawker Defendants

Seth D. Berlin, Esquire
Paul J. Safier, Esquire
Alia L. Smith, Esquire
Michael D. Sullivan, Esquire
Levine Sullivan Koch & Schulz, LLP
1899 L. Street, NW, Suite 200
Washington, DC 20036
sberlin@lskslaw.com
psafier@lskslaw.com
asmith@lskslaw.com
msullivan@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

Allison M. Steele
Rahdert, Steele, Reynolds & Driscoll, P.L.
535 Central Avenue
St. Petersburg, FL 33701
amnstee@aol.com
asteel@rahdertlaw.com
ncampbell@rahdertlaw.com
*Attorneys for Intervenor Times Publishing
Company*

WFTX-TV, Journal Broadcast Group, Vox Media, Inc., WFLA-TV, Media General Operations, Inc., Cable News Network, Inc., BuzzFeed and The Associated Press.

/s/ Kenneth G. Turkel

Attorney