

EXHIBIT 2

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

TERRY GENE BOLLEA,
professionally known as HULK
HOGAN,

Plaintiff,

Case No.
12-012447-CI-011

vs.

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

Defendants.

_____ /

HEARING BEFORE THE HONORABLE PAMELA A.M. CAMPBELL

DATE: July 1, 2015

TIME: 1:36 p.m. to 5:10 p.m.

PLACE: Pinellas County Courthouse
545 1st Avenue North
Third Floor
St. Petersburg, Florida

REPORTED BY: Aaron T. Perkins, RPR
Notary Public, State of
Florida at Large

Volume 2
Pages 123 to 301

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21 Attorneys for Defendant Gawker Media, LLC,
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23 ALSO PRESENT:
24

25 Heather L. Dietrick,
President and General Counsel for The Gawker
Media Group
Alison Steele, Esquire (for Media Outlets)
Rahdert, Steele Reynolds & Driscoll, P.L.
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1 before we were planning to start the trial. They
2 just don't have the manpower to do that.

3 I'm sorry. So don't spend any more time on
4 the questionnaire. We'll just deal with the
5 clerk's office. And then if there is some
6 streamlined way that you-all can agree as to what
7 you want me to do for cause, we'll just deal with
8 that pretty quickly with the voir dire. So stop
9 your work on the questionnaires and trying to get
10 the clipboards.

11 Sorry for that interruption. Okay. Let's go
12 to 21: Exclude testimony of Gawker witnesses on
13 issues about which they lack personal knowledge.

14 MR. BERRY: We skipped 20.

15 MR. TURKEL: No.

16 THE COURT: He said it needs to be reserved.

17 MR. VOGT: Twenty-one.

18 MR. BERRY: No. He reserved.

19 MR. VOGT: We reserved 21. We don't need to
20 hear it right now, 19 and 21.

21 THE COURT: Oh, Okay. So we're going to 20,
22 then?

23 MR. VOGT: Yes.

24 THE COURT: Okay.

25 MR. VOGT: And, Your Honor, this is --

1 "mygeek" is a witness that was added to witness
2 list, the trial witness list that had never been
3 previously disclosed.

4 THE COURT: Right. Response? Do you plan on
5 bringing somebody from "mygeek"?

6 MR. BERRY: We may be able to work this out
7 by stipulation. This relates --

8 THE COURT: Shocking.

9 MR. BERRY: Well, we've kind of agreed that
10 we might be able to depending on how your ruling
11 is here. This relates to the Shanti Shunn expert
12 report. As Mr. Safier explained this morning that
13 Mr. Shunn was deposed after the discovery cutoff.
14 And as part of his expert report he said that
15 people need to pay \$4.95 to watch celebrity sex
16 tapes on Vivid.

17 So when we went to do his deposition after
18 the discovery cutoff, one of the things that came
19 up in his report is a website that is called
20 "pornhub," which is a free website where you can
21 watch free porn, including celebrity sex tapes.
22 So I planned to ask him about that, because that,
23 in fact, comes up higher in the Google search than
24 Vivid. Mr. Shunn --

25 THE COURT: This week.

1 MR. SULLIVAN: I'm sorry?

2 THE COURT: This week.

3 MR. SULLIVAN: Well, Mr. Shunn had no
4 knowledge about anything relating to the porn
5 industry.

6 MR. BERRY: And so "mygeek" is the company
7 that owns "pornhub." And all they would testify
8 to is that you can watch celebrity sex tapes for
9 free that are posted by Vivid onto their website
10 for free, which takes the air out of the ruling
11 that Mr. Shunn would be flown down here. We'd be
12 willing to stipulate with the plaintiff that
13 that's a fact so that nobody needs to come in here
14 and rush around. But that's why the disclosure
15 happened after the close of discovery. We didn't
16 get the information until after discovery.

17 MR. VOGT: The problem with that, Your Honor,
18 is that they actually have documents and produced
19 the documents regarding the "pornhub" site before
20 the discovery cutoff, so they should have
21 disclosed the witness as well.

22 MR. BERRY: Right. Again, going back to
23 Judge Case's prior ruling, we had to disclose
24 those documents prior to Mr. Shunn's deposition so
25 that we could use them.

1 THE COURT: Okay. So the ruling, then, is if
2 Mr. Shunn testifies to that aspect, then "mygeek"
3 comes in, so denied.

4 MR. VOGT: Then we will need to depose this
5 person once the actual person is identified.

6 THE COURT: Okay. So can you identify, then,
7 by noon tomorrow?

8 MR. BERRY: I will do what I can.

9 THE COURT: Great. Thank you. I'm sure
10 you-all don't have anything else to do tomorrow.

11 Okay. Let's go to 22, and that is to exclude
12 evidence or arguments supporting Gawker's
13 good-faith defense based on advice of counsel.

14 MR. TURKEL: Yes, Judge. And they filed a
15 response to this one, and I think they're
16 misreading it. I mean, it's very simple. We
17 talked about how in Toffoloni they -- part of what
18 constituted Larry Flint's response in that case is
19 he went to the lawyers and talked to the lawyers
20 three times.

21 We asked them, and they objected on
22 privilege. We don't want them to try and argue to
23 a jury or to try to imply, or otherwise, even
24 reference the fact that there were discussions
25 between counsel, Gawker, and their operational

REPORTER'S CERTIFICATE

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

I, Aaron T. Perkins, Registered Professional Reporter, certify that I was authorized to and did stenographically report the above hearing 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 action.

Dated this 2nd day of July, 2015.

Aaron T. Perkins, RPR