

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.

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**MOTION TO DETERMINE CONFIDENTIALITY OF DEFENDANTS'  
NOTICE OF FILING CONFIDENTIAL DEPOSITION TRANSCRIPTS**

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 Notice of Filing Confidential Deposition Transcripts (the "Notice"), 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 Notice and the Exhibits attached thereto.

4. The Notice and accompanying exhibits refer to and include documents that have been designated as “Confidential” or “Attorneys’ Eyes Only”.

5. Counsel for Defendants 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 Notice and the Exhibits attached thereto, including treating as confidential only those materials that are properly treated as such under Rule 2.420 and this Court’s Protective Order.

March 17, 2016

Respectfully submitted,

THOMAS & LOCICERO PL

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 17th day of March, 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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