

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

HEATHER CLEM, *et al.*,

Defendants.

MOTION TO DETERMINE CONFIDENTIALITY OF COURT RECORDS

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 "Confidentiality Order"), Defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio (collectively, the "Gawker Defendants"), by and through undersigned counsel, hereby move to determine the confidentiality "Confidential Exhibit A" to their Opposition to Plaintiff's Motion for Leave to Conduct Expedited Post-Trial Financial Worth Discovery. As grounds for this motion, the Gawker 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 Confidentiality 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. The Gawker Defendants have designated "Confidential Exhibit A," concerning the transfer of stock to non-party minors, as "Confidential" pursuant to that Order.

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

WHEREFORE, the Gawker Defendants respectfully request that this Court determine the confidentiality of “Confidential Exhibit A.”

Dated: May 20, 2016

Respectfully submitted,

THOMAS & LOCICERO PL

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of May, 2016, I caused a true and correct copy of the foregoing to be served via the Florida Courts' E-Filing Portal upon the following counsel of record:

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