

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

TERRY GENE BOLLEA professionally  
known as HULK HOGAN,

Plaintiff,

Case No.: 12012447-CI-011

vs.

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

Defendants.

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**AFFIDAVIT OF A.J. DAULERIO**

I, A.J. Daulerio, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information and belief.

1. I provide this affidavit in connection with the Notice and Order served by this Court on August 1, 2016 and pursuant to Fla. Stat. § 56.29(2).

2. My assets are:

a. A 44.7% ownership interest in RGFree, Inc. (“RGFree”), a privately-held start-up media company that I founded and incorporated in Delaware in 2014. RGFree has never earned any revenue or made any profit, and is not currently operational. As a result, it is my understanding that my shares in RGFree have no value.

b. 9,000 shares in Gawker Media Group, Inc. (“GMGI”), a Cayman Islands company, which I am told is a 0.0059% ownership interest in the company.<sup>1</sup> I

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<sup>1</sup> I have not worked at Gawker since 2013, and I did not know how many shares I had. When I previously asked the company how many shares I had, I was told I had 5,900 shares and included that number in my prior affidavit. I am now told that I have 9,000 shares and that the earlier information was incomplete. I apologize for the error, but want to set the record straight.

understand that GMGI, and its two subsidiaries, have filed for bankruptcy and are currently up for auction in connection with that bankruptcy. I am not (and have never been) an officer, director or employee of GMGI. I have no personal knowledge of it or its subsidiaries' decision to file for bankruptcy or the bankruptcy case other than what has been publicly reported. I do not know what my shares in GMGI are worth and will not know until after the bankruptcy sale process is completed.

c. A checking account holding \$1,505.78 (a screenshot of my August 8, 2016 bank balance is attached as Exhibit 1). Because I do not currently have full-time employment, I have used money from this account for the past few months solely to pay for basic living expenses, including (a) a short-term rental through September, for which I had to pre-pay my rent, security deposit and most of my utilities; (b) ordinary bills such as food, clothing, transportation, telephone service, health care costs (including health insurance premiums), and other basic necessities; (c) required payments on credit card and student loan debt; and (d) expenditures associated with trying to secure new employment, including travel expenses. On August 8, I received a notice from my bank, attached as Exhibit 2, stating that it had placed a hold on my account because it had received a court order. Not being able to use the very limited funds in this account is a real hardship.

d. In addition to the money in this account, I also have some personal effects such as clothing, furniture, and the like.

3. I do not own a home or a car. I am not claiming or receiving the benefits of a "homestead exemption" under Article X, Section 4 of the Florida Constitution.

4. I understand that Mr. Bollea contends in this proceeding that I also have “indemnity rights and/or choses in action against Gawker Media, LLC and Gawker Media Group, Inc.” (Pl.’s *Ex Parte* Mot.).

a. There is an indemnification provision in my employment agreement, a copy of which is attached as Exhibit 3. I understand that Gawker produced this agreement to Mr. Bollea’s lawyers in July 2013.

b. Until Gawker filed for bankruptcy, it was paying for the attorneys who represent me in this case (as I explained at my deposition when asked about this).

c. I have been advised that Mr. Bollea is objecting in the bankruptcy case to Gawker’s continuing to pay for my attorneys in this case and to Gawker’s indemnifying me for the judgment.

d. Although this was not previously an issue (since Gawker was paying for my defense), I am now trying to get separate counsel to advise me because I understand that my lawyers in this case cannot advise me about indemnification by Gawker since they also represent the company. I have been having trouble finding my own lawyer to advise me because I do not have enough money to pay for one.

5. My liabilities are: the \$115,100,000 judgment against me in this case, \$26,378.70 in student loan debt and \$8,657.45 in credit card debt.

DATED: August 8, 2016

  
A.J. Daulerio