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.

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

Defendants.		

NOTICE OF VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE, pursuant to Rules 1.310(b)(1) and 1.310(b)(4), Florida Rules of Civil Procedure, Defendant Gawker Media, LLC, by and through the undersigned attorney, will take the deposition testimony of the following:

DEPONENT: Plaintiff Terry Gene Bollea

DATES: November 12, 2013 and November 14, 2013

TIME: 9:30 a.m., until completion

PLACE: Riesdorph Reporting Group

Northern Trust

100 Second Avenue South, Suite 104-S

St. Petersburg, FL 33701

(727) 822-0949

upon oral examination, before an officer duly authorized to administer oaths by the laws of the State of Florida, and a person who is neither a relative, nor attorney, nor counsel of any of the parties and who is neither a relative nor employee of such attorney or counsel, and who is not financially interested in the examination. The oral examination will be videotaped by an operator from Riesdorph Reporting Group, 100 Second Avenue South, Suite 104-S, St.

Petersburg, FL 33701, and Defendant Gawker Media, LLC shall bear the initial cost of the videotaping.

This deposition is being taken for the purpose of discovery, and for use at trial, or both of the foregoing, or for such other purposes as are permitted under the applicable and governing rules.

Respectfully submitted,

THOMAS & LOCICERO PL

By: 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

Seth D. Berlin
(admitted *pro hac vice*, No. 103440)
Paul J. Safier
(admitted *pro hac vice*, No. 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 psafier@lskslaw.com

Counsel for Gawker Media, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of August 2013, I caused a true and correct copy of the foregoing to be served by email upon the following counsel of record:

Kenneth G. Turkel, Esq. kturkel@BajoCuva.com Christina K. Ramirez, Esq. cramirez@BajoCuva.com Bajo Cuva Cohen & Turkel, P.A. 100 N. Tampa Street, Suite 1900 Tampa, FL 33602

Tel: (813) 443-2199 Fax: (813) 443-2193

Charles J. Harder, Esq. charder@HMAfirm.com
Harder Mirell & Abrams LLP
1801 Avenue of the Stars, Suite 1120
Los Angeles, CA 90067

Tel: (424) 203-1600 Fax: (424) 203-1601

Attorneys for Plaintiff

Barry A. Cohen, Esq. bcohen@tampalawfirm.com Michael W. Gaines mgaines@tampalawfirm.com Barry A. Cohen Law Group 201 East Kennedy Boulevard, Suite 1000 Tampa, FL 33602

Tel: (813) 225-1655 Fax: (813) 225-1921

Attorneys for Defendant Heather Clem

David Houston, Esq. Law Office of David Houston dhouston@houstonatlaw.com 432 Court Street Reno, NV 89501 Tel: (775) 786-4188

Gregg D. Thomas
Attorney