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:	Defendant Heather Clem
DATES:	November 13, 2013
TIME:	9:30 a.m., until completion
PLACE:	Thomas & LoCicero PL 601 South Boulevard Tampa, FL 33606 (813) 984-3060

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, 201 North Tampa Street, Suite 712, Tampa, FL

33602, 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

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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:

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