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

TERRY GENE BOLLEA professionally known as HULK HOGAN,

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Case No.: 12012447-CI-011

VS.

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

Defendants.	
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## NOTICE OF VIDEOTAPED DEPOSITION OF HEATHER CLEM

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

DEPONENT: Defendant Heather Clem

DATES: March 5, 2014

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.

Dated: January 7, 2014 Respectfully submitted,

THOMAS & LOCICERO PL

By: Gregg D. Thomas

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Counsel for Gawker Media, LLC

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 7th day of January 2014, I caused a true and correct copy of the foregoing to be served electronically upon the following counsel of record at their respective email addresses via the Florida Courts E-Filing Portal:

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