## 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; GAWKER MEDIA, LLC aka GAWKER MEDIA; GAWKER MEDIA GROUP, INC. aka GAWKER MEDIA; GAWKER ENTERTAINMENT, LLC; GAWKER TECHNOLOGY, LLC; GAWKER SALES, LLC; NICK DENTON; A.J. DAULERIO; KATE BENNERT, and BLOGWIRE HUNGARY SZELLEMI ALKOTAST HASZNOSITO KFT aka GAWKER MEDIA,

Defendants.

## AMENDED NOTICE OF TAKING DEPOSITIONS

TO DEFENDANTS, and counsel of record:

PLEASE TAKE NOTICE that Plaintiff Terry Gene Bollea will take the depositions of the

persons named below, on the dates, at the hours and the places indicated:

Name	Date and Time	Location
Tony Burton	June 3, 2014 12:00 p.m.	Esquire Solutions 1384 Broadway, 19th Floor New York, NY 10018 (212) 687-8010
Custodian of Records	June 4, 2014	Esquire Solutions
Don Buchwald & Associates, Inc.	10:00 a.m.	1384 Broadway, 19th Floor New York, NY 10018 (212) 687-8010
Custodian of Records	June 4, 2014	Esquire Solutions
Don Buchwald & Associates,	2:00 p.m.	1384 Broadway, 19th Floor
Inc.		New York, NY 10018 (212) 687-8010

upon oral examination before a member of Esquire Solutions, official court reporters and/or some other officer duly authorized by law to take depositions.

The deposition is being taken for purposes of discovery, for use at trial and for all other purposes as are permitted under the Florida Rules of Civil Procedure. The deposition shall continue from day to day until completed. The deposition may be recorded by video and/or using instant visual display of the testimony (*e.g.*, Live Note), as well as stenographically.

## PLEASE GOVERN YOURSELVES ACCORDINGLY.

DATED: April 15, 2014

/s/ Kenneth G. Turkel Charles J. Harder, Esq. PHV No. 102333 HARDER MIRELL & ABRAMS LLP 1801 Avenue of the Stars, Suite 1120 Los Angeles, CA 90067 Tel: (424) 203-1600 Fax: (424) 203-1601 Email: charder@hmafirm.com

-and-

Kenneth G. Turkel, Esq. Florida Bar No. 867233 Christina K. Ramirez, Esq. Florida Bar No. 954497 BAJO CUVA COHEN & TURKEL, P.A. 100 North Tampa Street, Suite 1900 Tampa, Florida 33602 Tel: (813) 443-2199 Fax: (813) 443-2193 Email: <u>kturkel@bajocuva.com</u> Email: <u>cramircz@bajocuva.com</u> Counsel for Plaintiff

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-mail via the e-portal system this 15th day of April 2014 to the following:

Barry A. Cohen, Esquire Michael W. Gaines, Esquire Barry Cohen, Esquire Michael W. Gaines, Esquire The Cohen Law Group 201 E. Kennedy Blvd., Suite 1000 Tampa, Florida 33602 bcohen@tampalawfirm.com mgaines@tampalawfirm.com jrosario@tampalawfirm.com Counsel for Heather Clem

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<u>/s/ Kenneth G. Turkel</u> Attorney