

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.

SUBPOENA DUCES TECUM WITHOUT DEPOSITION

THE STATE OF FLORIDA:

TO: **Fox News Network, LLC**
c/o Nicholas Lanoie
1211 Avenue of the Americas
New York, NY 10036

YOU ARE COMMANDED by Defendant Gawker Media, LLC, to produce the documents described in Schedule A to Michael Berry, Esquire, Levine Sullivan Koch & Schulz, LLP, 321 West 44th Street, Suite 1000, New York, NY 10036 on or before December 1, 2014 at 10:00 a.m.

In the alternative, you may mail the requested documents to Michael Berry, Esquire, Levine Sullivan Koch & Schulz, LLP, 321 West 44th Street, Suite 1000, New York, NY 10036. If you fail to comply, you may be in contempt of court.

You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney, you shall respond to this subpoena as directed. You have a right to object to the production under Florida Rule of Civil Procedure 1.351 and you will not be required to surrender the documents or things requested. No testimony will be taken.

DATED on _____.

Rachel E. Fugate, Esquire
For the Court

Rachel E. Fugate
Florida Bar No. 0144029
Attorney for Gawker Media, LLC
Thomas & LoCicero, PL
601 South Boulevard
Tampa, FL 33606
(813) 984-3060 Telephone
(813) 984-3070 Facsimile
rfugate@tlolawfirm.com

SCHEDULE A

DEFINITIONS

1. "You" and "your" mean Fox News Network, LLC, and any subsidiaries, partners, employees, agents, attorneys, or other persons or entities acting for or on behalf of or in concert with Fox News Network, LLC, including but not limited to Fox Business Network.
2. "Imus in the Morning" means the program by that name that you broadcast.
3. "Terry Bollea" means Terry Gene Bollea (professionally known as "Hulk Hogan").
4. "Hulk Hogan" means the character played by Terry Bollea.

DOCUMENTS TO BE PRODUCED

Request No. 1: A copy of the "Imus in the Morning" program that You broadcast on October 10, 2012 and which featured Terry Bollea or Hulk Hogan. This request seeks only material that has been broadcast, posted on the Internet, or otherwise made publicly available by you.