

**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 VIDEOTAPED DEPOSITION**

TO HEATHER CLEM a/k/a Heather Cole, and her counsel of record:

PLEASE TAKE NOTICE that Plaintiff Terry Gene Bollea, by and through the undersigned attorney, will take the deposition of Defendant HEATHER CLEM, a/k/a Heather Cole, **on January 26, 2015**, from 10:00 a.m. until completion at the offices of Bajo Cuva Cohen & Turkel, located at 100 North Tampa Street, Suite 1900, Tampa, Florida 33602 upon oral examination, before an official court reporter 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 YOURSELF ACCORDINGLY.**

DATED: December 8, 2014

*/s/ Kenneth G. Turkel*

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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 8th day of December, 2014 to the following:

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*/s/ Kenneth G. Turkel*  
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