

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

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

SUBPOENA DUCES TECUM

vs.

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,

Case No. 12012447CI-011

Defendants.

SUBPOENA DUCES TECUM WITHOUT DEPOSITION

THE STATE OF FLORIDA:

TO: **NBCUniversal Media, LLC**
c/o Kimberley D. Harris, Executive Vice President and General Counsel
30 Rockefeller Plaza
New York, New York 10112

YOU ARE COMMANDED by Plaintiff Terry Gene Bollea to produce the documents described in Schedule A to **John Golaszewski Esq., Law Offices of John V. Golaszewski, 130 W. 42nd Street, Suite 1002, New York, New York 10036** at 10:00 a.m. twenty (20) days after this subpoena duces tecum is served upon you.

In the alternative, you may mail the requested documents to Charles J. Harder, c/o Harder Mirell & Abrams LLP, 1925 Century Park East, Suite 800, Los Angeles, California 90067. 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 subpoena under Florida Rule of Civil Procedure 1.410. You have the right to designate as Confidential any applicable document or testimony as specified under the Agreed Protective Order Governing Confidentiality, signed and ordered by the Court on July 25, 2013, a copy of which is attached hereto as Schedule B. A copy of the First Amended Complaint in this action is attached hereto for your reference as Schedule C.

DATED on _____.

Charles J. Harder
For the Court

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-and-

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SCHEDULE A

Definitions and Instructions

As used in this Request for Production of Documents:

1. “YOU” or “YOUR” or “NBC” means NBCUniversal Media, LLC., its parent company, subsidiaries, affiliated companies, and all of their members, shareholders, managers, executives, officers, board members, employees, agents, representatives, attorneys, and all other PERSONS acting on behalf of any and all such PERSONS.

2. “PERSON” means any natural person, firm, partnership, association, proprietorship, joint venture, corporation, governmental agency, or other organization or legal or business entity, as well as any agents, attorneys and consultants therefor, and all other PERSONS acting or purporting to act on its behalf.

Documents To Be Produced

1. A copy of the Rock Center interview of Nick Denton that was broadcast on or around March 7, 2012.

2. A copy of the article, “Gawker founder Nick Denton agrees website is ‘Snarky... Sexual... Shameless... Mean (occasionally),’” as published at http://rockcenter.nbcnews.com/_news/2012/03/06/10592821-gawker-founder-nick-denton-agrees-website-is-snarky-sexual-shameless-mean-occasionally on or about March 6, 2012.