

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.

**SECOND AMENDED NOTICE OF VIDEOTAPED DEPOSITION**

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

**DEPONENT:** Defendant Heather Clem  
**DATES:** January 26, 2015  
**TIME:** 10:00 a.m., until completion  
**PLACE:** Bajo Cuva Cohen & Turkel, P.A.  
100 N. Tampa Street, Suite 1900  
Tampa, FL 33602  
(813) 443-2199

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.

Respectfully submitted,

THOMAS & LOCICERO PL

By: /s/ Gregg D. Thomas

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 15th day of January 2015, I caused a true and correct copy of the foregoing to be served by email upon the following counsel of record:

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