

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 TAKING OF VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that, pursuant to Florida Rules of Civil Procedure 1.310(b)(6),
Defendant Gawker Media, LLC, by and through the undersigned attorneys, will take the
deposition testimony of the following:

DEPONENT: Jules Wortman

DATE: April 7, 2015

TIME: 10:00 a.m., until completion

**PLACE: Offices of Bradley Arant Boult & Cummings, LLP
Roundabout Plaza
160 Division Street
Suite 700
Nashville, TN 37203
(615) 224-2582**

upon oral examination, before an officer duly authorized to administer oaths by the laws of the
State of Tennessee, 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 taken by an operator

from Anne S. Wilson and Associates, 111 Chatsworth Drive, Nashville, TN 37215, and videotaped by an operator from Nashville's Media Services, 314 Hermitage Ave, Nashville, TN 37210, and Defendant Gawker Media, LLC shall bear the initial cost of the videotaping.

This deposition is being taken for the purpose of discovery, and for use at trial, or both of the foregoing, or for such other purposes as are permitted under the applicable and governing rules.

Respectfully submitted,

THOMAS & LOCICERO PL

By: /s/ Rachel E. Fugate

Gregg D. Thomas

Florida Bar No.: 223913

Rachel E. Fugate

Florida Bar No.: 0144029

601 South Boulevard

P.O. Box 2602 (33601)

Tampa, FL 33606

Telephone: (813) 984-3060

Facsimile: (813) 984-3070

gthomas@tlolawfirm.com

rfugate@tlolawfirm.com

Seth D. Berlin

Pro Hac Vice Number: 103440

Michael Berry

Pro Hac Vice Number: 108191

Alia L. Smith

Pro Hac Vice Number: 104249

Paul J. Safier

Pro Hac Vice Number: 103437

LEVINE SULLIVAN KOCH & SCHULZ, LLP

1899 L Street, NW, Suite 200

Washington, DC 20036

Telephone: (202) 508-1122

Facsimile: (202) 861-9888

sberlin@lskslaw.com

mberry@lskslaw.com

asmith@lskslaw.com

psafier@lskslaw.com

Counsel for Defendant Gawker Media, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of March 2015, I caused a true and correct copy of the foregoing to be served by email upon the following counsel of record:

Kenneth G. Turkel, Esq.
kturkel@BajoCuva.com
Shane B. Vogt, Esq.
shane.vogt@BajoCuva.com
Bajo Cuva Cohen & Turkel, P.A.
100 N. Tampa Street, Suite 1900
Tampa, FL 33602
Tel: (813) 443-2199
Fax: (813) 443-2193

David Houston, Esq.
Law Office of David Houston
dhouston@houstonatlaw.com
432 Court Street
Reno, NV 89501
Tel: (775) 786-4188

Charles J. Harder, Esq.
charder@HMAfirm.com
Douglas E. Mirell, Esq.
dmirell@HMAfirm.com
Sarah Luppen, Esq.
sluppen@HMAfirm.com
Harder Mirell & Abrams LLP
1925 Century Park East, Suite 800
Los Angeles, CA 90067
Tel: (424) 203-1600
Fax: (424) 203-1601

Attorneys for Plaintiff

Barry A. Cohen, Esq.
bcohen@tampalawfirm.com
Michael W. Gaines
mgaines@tampalawfirm.com
Barry A. Cohen Law Group
201 East Kennedy Boulevard, Suite 1950
Tampa, FL 33602
Tel: (813) 225-1655
Fax: (813) 225-1921

Attorneys for Defendant Heather Clem

Rachel E. Fugate
Attorney