

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.

_____ /

REQUEST FOR HEARING

Defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio (collectively, the “Gawker Defendants”), and their counsel, including Levine Sullivan Koch & Schulz, LLP and Thomas & LoCicero, PL, hereby request that the Court schedule a hearing on plaintiff’s Emergency Motion to Conduct Discovery Concerning Potential Violation of Protective Order, to Compel Turnover of Confidential Discovery Materials and for Order to Show Cause.

On July 30, 2015, at a Case Management Conference and hearing scheduled to hear other motions, the Court held an initial oral argument on plaintiff’s Motion. That argument was conducted just one day after plaintiff filed his Motion and before the Gawker Defendants had an opportunity to file a written response or meaningfully analyze the issues raised by the Motion. Indeed, prior to the hearing, the Court was unaware of the Motion and had not received a copy of the Motion papers. *See* July 30, 2015 Hrg. Tr. at 5:3 – 6:1, 8:23 – 9:2 (Ex. A). Given the “serious circumstances” cited in the Motion and this Court’s subsequent preservation order, the gravity of the charges leveled by plaintiff, and the unprecedented nature of the discovery and other relief plaintiff seeks, the Gawker Defendants and their counsel respectfully request an

opportunity to be heard in full now that they have filed their opposition to plaintiff's Motion and for oral argument to be held on that Motion.

This Court entered an order on August 6, 2015 requiring the Gawker Defendants and their counsel to preserve electronic evidence. In light of that order and the compliance by the Gawker Defendants and their counsel, plaintiff's Motion does not present an "emergency" of the type that should be decided without a meaningful opportunity for a hearing following reasonable notice. Accordingly, oral argument should be held now that both parties have had an opportunity to file written submissions.

August 11, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of August, 2015, I caused a true and correct copy of the foregoing to be served via the Florida Courts' E-Filing Portal on the following counsel of record:

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