

# EXHIBIT 1

to the

**GAWKER DEFENDANTS' NOTICE OF FILING OF  
CORRESPONDENCE TO COURT REGARDING PROPOSED ORDERS**



LEVINE SULLIVAN  
KOCH & SCHULZ, LLP

1899 L Street, NW  
Suite 200  
Washington, DC 20036  
(202) 508-1100 | Phone  
(202) 861-9888 | Fax

Seth D. Berlin  
(202) 508-1122  
sberlin@lskslaw.com

Michael Berry  
(215) 988-9773  
mberry@lskslaw.com

September 11, 2015

**VIA EMAIL AND HAND DELIVERY**

The Honorable Pamela A.M. Campbell  
Sixth Judicial Circuit  
St. Petersburg Judicial Building  
545 First Avenue N., Room 300  
St. Petersburg, FL 33701

**Re: *Terry Gene Bollea v. Clem, Gawker Media, LLC, et al.***  
**Case No.: 12012447-CI-011**

Dear Judge Campbell:

We write in response to the correspondence from plaintiff's counsel delivered to Your Honor earlier today.

First, with respect to the competing proposed orders on plaintiff's Motion for Clarification, we have enclosed a copy of our August 17, 2015 correspondence to Your Honor explaining our strenuous objections to plaintiff's proposed order. As that correspondence details, plaintiff's proposed order is (1) inconsistent with what the Court ruled at the July 30, 2015 hearing, (2) disregards the Gawker Defendants' notice that they do not consent to proceeding before a discovery magistrate, (3) overlooks the Court's subsequent order that the Gawker Defendants preserve certain documents and data, and (4) directs the Gawker Defendants to take certain actions for which plaintiff never filed a written motion. Consistent with Your Honor's direction at the July 30 hearing and August 6, 2015 preservation order, the status quo has been preserved. Plaintiff's proposed order goes far beyond the status quo and seeks far-reaching relief. Accordingly, we believe these matters should be addressed at the October 1, 2015 case management conference, which will be held two days after the parties' mediation on September 29.

Second, with respect to the proposed order on plaintiff's Emergency Motion for Leave to Conduct Discovery, that Motion remains vigorously contested, as reflected in the Joint Opposition of the Gawker Defendants and Their Counsel, which was filed on August 11. At that time, we also filed a Request for Hearing on Plaintiff's Emergency Motion. We have enclosed



LEVINE SULLIVAN  
KOCH & SCHULZ, LLP

Hon. Pamela A.M. Campbell  
September 11, 2015  
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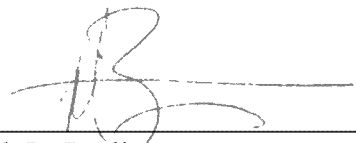
another copy of that Request with this letter. We filed that Request because, prior to the July 30 hearing, the Court had not received plaintiff's motion papers, and neither the Gawker Defendants nor their counsel had adequate time to address the arguments raised in that lengthy motion. Since we filed our Joint Opposition, plaintiff filed a reply brief and a new proposed order. That proposed order differs materially from the relief plaintiff originally requested in his Emergency Motion, which is what was discussed at the July 30 hearing and was the focus of the Joint Opposition. We again respectfully renew our request for a hearing on this issue.

Given the seriousness of the factual allegations that plaintiff has leveled against our clients and defense counsel, and the severity of the relief requested in both of plaintiff's proposed orders, we believe that a proper hearing is required. We therefore respectfully request that the Court hear argument on these two matters at the previously scheduled October 1 case management conference.

Thank you for your consideration.

Respectfully,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By:   
Seth D. Berlin  
Michael Berry

Enclosures

cc: All counsel of record (via electronic mail)



LEVINE SULLIVAN  
KOCH & SCHULZ, LLP

1899 L Street, NW  
Suite 200  
Washington, DC 20036  
(202) 508-1100 | Phone  
(202) 861-9888 | Fax

Seth D. Berlin  
(202) 508-1122  
sberlin@lskslaw.com

Michael Berry  
(215) 988-9773  
mberry@lskslaw.com

August 17, 2015

**VIA EMAIL AND HAND DELIVERY**

The Honorable Pamela A.M. Campbell  
Sixth Judicial Circuit  
St. Petersburg Judicial Building  
545 First Avenue N., Room 300  
St. Petersburg, FL 33701

**Re: *Terry Gene Bollea v. Clem, Gawker Media, LLC, et al.***  
**Case No.: 12012447-CI-011**

Dear Judge Campbell:

I write with respect to the correspondence dated August 14, 2015 from counsel for plaintiff Terry Bollea concerning proposed orders on plaintiff's Emergency Motion for Clarification. Defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio (collectively, the "Gawker Defendants") strenuously object to the proposed order submitted by plaintiff for the following reasons:

First, the Gawker Defendants object to plaintiff's proposed order to the extent it recites various rulings about the treatment of documents produced by the federal government (and their disclosure to Gawker's General Counsel Heather Dietrick) that the Court simply did not make. *See, e.g.*, Pl.'s Proposed Order ¶¶ 4, 6, 7-9, 11. The Court made clear that it had not reviewed the documents at issue, and that they would need to be reviewed before conclusive rulings could be issued. *See, e.g.*, July 30, 2015 Hrg. Tr. at 74:8-11 (THE COURT: "I haven't seen the 1100 pages [of FBI documents]. I haven't seen the audio. I'm handed five inches of paper this morning to review and I've not reviewed it."); *see also id.* at 76:19-22 (THE COURT: "I have not seen those materials . . ."). Indeed, under Florida law and the Agreed Protective Order, it is plaintiff's burden to establish that documents are properly designated as Confidential or "Attorneys' Eyes Only," or to exclude a party's counsel from the "Attorneys' Eyes Only" designation, but he has not yet submitted a single document for review. As such, not only was no definitive ruling made on those issues, but one could not have been made without judicial review.

Second, while the Court indicated that it would like “to send [these issues] over to Judge Case as the discovery magistrate to make those rulings,” *id.* at 74:20-22; *see also id.* at 73:9-12, 73:22 – 74:7, 77:4-5 (same), the Gawker Defendants have notified the Court that they do not consent to further proceedings before a Special Discovery Magistrate and object to the Special Discovery Magistrate’s considering any of these issues or any issues that might arise in the future. While plaintiff has filed an objection to the Gawker Defendants’ notice, the Gawker Defendants’ continued consent is required as a matter of law. *See, e.g.*, Fla. R. Civ. P. 1.490(c). As a result, the Gawker Defendants object to the various provisions of plaintiff’s proposed order that would refer issues to the Special Discovery Magistrate. *See* Pl.’s Proposed Order ¶¶ 1, 5, 6, 12.

Third, the Gawker Defendants object to the provisions of plaintiff’s proposed order stating that “[n]o copies of any records, video and audio recordings, documents and other materials” produced by the federal government “shall remain in Ms. Dietrick’s possession, custody, or control.” Pl.’s Proposed Order ¶ 7. Although the Court did not rule on the confidentiality of each document and record produced by the federal government, Your Honor made clear that the parties should provisionally treat all of those materials as “Highly Confidential – Attorneys’ Eyes Only” and should no longer share them with Ms. Dietrick until further judicial review could be conducted. July 30, 2015 Hrg. Tr. at 72:23 – 73:7. While we have and will continue to comply with that directive, plaintiff’s proposed order goes far beyond that in two respects, first, by purporting to adjudicate that issue decisively and permanently even though the Court did no such thing and, second, by purporting to require Ms. Dietrick to dispose of information and documents she already possessed.

With respect to the latter provision, plaintiff never requested such relief in his motion, in the proposed order accompanying his motion, or at the July 30 hearing. Moreover, plaintiff’s after-the-fact attempt to include such relief in his proposed order submitted last week directly conflicts with this Court’s August 6, 2015 Preservation Order. It is simply impossible for Ms. Dietrick to both preserve all evidence and simultaneously delete certain evidence, and this is particularly significant in light of counsel’s need to defend themselves against plaintiff’s baseless charge that they might have leaked that very evidence. That said, as we have confirmed to Your Honor previously, Ms. Dietrick is complying with the August 6 preservation order, and, since the July 30 hearing, we have not and will not share with Ms. Dietrick any material produced by the federal government or its contents, and will continue not to do so until the scope of plaintiff’s “Attorneys’ Eyes Only” designation has been more fully adjudicated as contemplated by the Court.

Fourth, the Gawker Defendants object to the provision of plaintiff’s proposed order providing that “[n]o copies of the audio recordings shall remain in Gawker Defendants’ counsels’ possession, custody, or control” and that they shall be turned over to Judge Case. Pl.’s Proposed Order ¶ 6. Putting aside the Gawker Defendants’ lack of consent to further proceedings before a Special Discovery Magistrate, this request for relief was not included in plaintiff’s motion for clarification nor in the proposed order that accompanied that motion, and

the Gawker Defendants therefore had no meaningful opportunity to address it. More significantly, the oral request for relief was based on two factual misstatements to the Court. First, plaintiff represented to the Court that the audio footage is, “in essence, the same thing as the DVDs,” creating the impression that it was simply audio from the sex tapes. July 30, 2015 Hrg. Tr. at 71:11-12. In truth, the audio footage is from the FBI sting operation and

See, e.g., Confidential Exhibit 18-C to Opposition to Plaintiff’s Emergency Motion (copy of audio of Dec. 2012 sting operation); Conf. Decl. of G. Thomas, filed July 30, 2015 at ¶¶ 16, 20. Second, plaintiff represented to the Court that neither he nor his counsel knew about this footage, which is why it had not been addressed earlier. July 30, 2015 Hrg. Tr. at 71:5-9. That, too, is not true,

See, e.g., Conf. Thomas Decl. at ¶ 22.

The audio footage is central evidence in this case, as it reveals, among other things, that and that plaintiff and his counsel made numerous false statements to the Court during this case. See, e.g., Conf. Thomas Decl. ¶¶ 49 – 61. The audio footage also disproves plaintiff’s charges that the Gawker Defendants or their counsel violated the Agreed Protective Order as it clearly shows that the *National Enquirer*’s reporting was not based on footage held by counsel. Finally, that audio footage also continues to be central evidence that the Gawker Defendants need in connection with the ongoing FOIA litigation. Plaintiff’s request that it be turned over is a transparent effort to prevent the Gawker Defendants from using this key evidence in their defense of this action, in their response to his charges that they or their counsel violated a court order, in their litigation of the FOIA case, or in documenting plaintiff’s fraud on the court.

Finally, the Gawker Defendants object to the portion of plaintiff’s proposed order that seeks to limit how the FOIA Authorizations signed by plaintiff and counsel are to be construed “by the United States Government.” Pl.’s Proposed Order ¶ 11. The FOIA Authorizations make plain that release of records is authorized to Gregg Thomas, and the Stipulated Protocol and this Court’s prior orders make clear that counsel in this case may access the documents, setting forth a procedure for requesting and handling those records. Counsel for the Gawker Defendants have complied with those procedures, provisionally modified going forward with respect to Ms. Dietrick. Plaintiff has never explained his purpose in seeking to impose further limitations on how the federal government might construe the Authorizations, and the Court did not rule on this issue at the July 30 hearing. In any event, this Court does not have authority to direct the federal government’s actions in this regard. See U.S. CONST. art. VI, cl. 2.

The Gawker Defendants respectfully request that the Court enter their proposed order on plaintiff’s Motion for Clarification, a copy of which is enclosed and which includes a provision excluding Ms. Dietrick from receiving material produced by the federal government going forward until the Court is able to adjudicate this issue more fully. We also respectfully request



LEVINE SULLIVAN  
KOCH & SCHULZ, LLP

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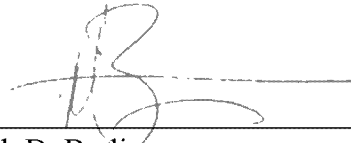
that the Court advise when and how you would like to address the open matters identified during the July 30 hearing.

Thank you for your consideration.

Respectfully,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: \_\_\_\_\_

  
Seth D. Berlin  
Michael Berry

cc: All counsel of record (via electronic mail)

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,

THOMAS & LOCICERO PL

By: Gregg D. Thomas

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

and

Seth D. Berlin

Pro Hac Vice Number: 103440

Michael D. Sullivan

Pro Hac Vice Number: 53347

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  
msullivan@lskslaw.com  
mberry@lskslaw.com  
asmith@lskslaw.com  
psafier@lskslaw.com

*Attorneys for Defendant Gawker Media, LLC, Nick  
Denton, and A.J. Daulerio and Their Counsel*

**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:

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

*Attorneys for Plaintiff*

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

*Attorney for Plaintiff*

Timothy J. Conner  
Holland & Knight LLP  
50 North Laura Street, Suite 3900  
Jacksonville, FL 32202  
timothy.conner@hkllaw.com

Charles D. Tobin  
Holland & Knight LLP  
800 17th Street N.W., Suite 1100  
Washington, D.C. 20006  
charles.tobin@hkllaw.com

*Attorneys for Intervenors First Look  
Media, Inc., WFTS-TV and WPTV-TV,  
Scripps Media, Inc., WFTX-TV, Journal  
Broadcast Group, Vox Media, Inc., Cable  
News Network, Inc., BuzzFeed and The  
Associated Press*

Charles J. Harder, Esq.  
charder@HMAfirm.com  
Jennifer McGrath, Esq.  
jmcgrath@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*

Allison M. Steele  
Rahdert, Steele, Reynolds & Driscoll, P.L.  
535 Central Avenue  
St. Petersburg, FL 33701  
amnestee@aol.com  
asteel@rahdertlaw.com  
ncampbell@rahdertlaw.com

*Attorney for Intervenor Times Publ'g Co.*

/s/ Gregg D. Thomas  
Attorney

**EXHIBIT A**  
**to**  
**GAWKER DEFENDANTS' REQUEST FOR HEARING**

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

TERRY GENE BOLLEA, professionally  
known as HULK HOGAN,

Plaintiff,

vs.

Case No. 12-012447-CI-011

HEATHER CLEM; GAWKER MEDIA, LLC,  
aka GAWKER MEDIA, et al.,

Defendants.

\_\_\_\_\_/

HEARING BEFORE THE HONORABLE PAMELA A.M. CAMPBELL

Case Management and Status Conference

DATE: July 30, 2015

TIME: 10:00 a.m. to 11:48 a.m.

PLACE: Pinellas County Courthouse  
545 First Avenue North  
Third Floor, Courtroom C  
St. Petersburg, Florida

BEFORE: Valerie A. Hance, RPR  
Notary Public, State of  
Florida at Large

Pages 1 to 92

## 1 APPEARANCES:

2 CHARLES J. HARDER, ESQUIRE (via telephone)  
3 Harder Mirell & Abrams, LLP  
4 1925 Century Park East  
Suite 800  
Los Angeles, California 90067

5 - and -

6 DAVID R. HOUSTON, ESQUIRE (via telephone)  
7 Law Office of David R. Houston  
432 Court Street  
8 Reno, Nevada 89501

9 - and -

10 KENNETH G. TURKEL, ESQUIRE  
11 SHANE B. VOGT, ESQUIRE  
Bajo Cuva Cohen & Turkel, P.A.  
12 100 North Tampa Street  
Suite 1900  
Tampa, Florida 33602  
Attorneys for Plaintiff

13  
14  
15 CONTINUED:  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 APPEARANCES CONTINUED:

2 SETH D. BERLIN, ESQUIRE  
3 Levine Sullivan Koch & Schulz, LLP  
4 1899 L Street, N.W.  
Suite 200  
Washington, D.C. 20036

5 - and -

6 MICHAEL BERRY, ESQUIRE  
7 Levine Sullivan Koch & Schulz, LLP  
8 1760 Market Street  
Suite 1001  
Philadelphia, Pennsylvania 19103

9 - and -

10 HEATHER DIETRICK, ESQUIRE  
11 General Counsel  
Gawker Media  
12 210 Elizabeth Street  
Third Floor  
13 New York, New York 10012

14 - and -

15 GREGG D. THOMAS, ESQUIRE  
16 Thomas & LoCicero PL  
601 South Boulevard  
Tampa, Florida 33606  
Attorneys for Defendant  
17 Gawker Media, LLC

18 ALSO PRESENT:

19 Terry Gene Bollea  
20  
21  
22  
23  
24  
25

## P R O C E E D I N G S

(Court called to order at 10:00 a.m.)

THE COURT: So we're here in Case No.

12-012447, Bollea vs. Gawker and others. We're here this morning for the plaintiff's emergency motion for clarification and confirmation that the agreed protected order and stipulated protocol govern all documents, reference and materials, produced in response to the Freedom of Information Act request of Gawker Media, LLC, and its' attorneys request for status conference. We're also here today for a case management conference. I would like to be able to schedule the trial in this matter.

And at this point in time, is there anything -- who is going to be arguing that motion, Mr. Turkel?

MR. TURKEL: Your Honor, we have three motions pending. The first one you mentioned, the emergency motion for clarification on the protocol.

And may it please the Court, Judge. And good morning.

The plaintiffs noticed an action is at issue, and motion to grant priority status and to set the case for trial, and the emergency motion we filed for leave to conduct discovery on a potential violation of protective order in this case by the



1 defendants.

2 Mr. Vogt will be handling the set the cause for  
3 trial motion and the clarification of the protocol.  
4 I'm going to handle the discovery motion.

5 THE COURT: All right. Thank you. Which would  
6 you like to do first?

7 MR. TURKEL: Judge, we'll take them in any  
8 order which the Court deems appropriate. The  
9 headiest of the three is probably the motion for  
10 leave to conduct discovery. It implicates the most  
11 issues.

12 It sounds to me, by noticing this for case  
13 management, that we intend to walk out of here with  
14 a trial date anyway, and so, really, that motion  
15 seems to somewhat have been addressed by the Court  
16 by that statement.

17 So if it please the Court, I think probably  
18 taking that first will be the best order of things.

19 THE COURT: Go ahead.

20 MR. TURKEL: Judge, it's been a volatile few  
21 weeks since we were last in front of you.  
22 Understanding we were on the doorstep of trying this  
23 case and the case got continued at the last minute,  
24 I'm sure to no one's benefit, in the sense that we  
25 were all working hard to get ready, including this

1       sideshow, the circus that Gawker seems to want to  
2       attempt and bait into this courtroom doesn't become  
3       the focus of it, but it focuses on the assertion of  
4       those rights and their defenses.

5             And, Judge, we have rules in this game. And we  
6       agree, when we take the oath, to abide by those  
7       rules. And we will disagree all day, until the jury  
8       or judge comes back, on whether my client's privacy  
9       rights supercede their asserted First Amendment  
10      right. And that's what we're here to try. It's  
11      never been any different. And I know the Court  
12      knows that, because we spent nine hours vetting the  
13      legal issues in this case on summary judgment and  
14      you entered your order on that.

15            And, you know, we agree to abide by these rules  
16      and we agree to play by them. And you call the  
17      balls and the strikes and you make your judgments as  
18      a judge and we live with them. And if we don't like  
19      them, that's what we do. And then we try the case  
20      and appeal it if we don't like it. And I think  
21      that's a pretty succinct version of how it's  
22      supposed to work in our system.

23            Judge, we have put before you -- and I don't  
24      know -- we obviously filed this on an emergent  
25      basis. I don't know if the Court had a chance to

1 read this motion yet on the discovery issue.

2 THE COURT: I haven't even seen it.

3 MR. TURKEL: Do we have a courtesy copy, Shane?

4 Judge, I'm going to hand you, if I may  
5 approach, a courtesy copy without the voluminous  
6 exhibits, which we can hand you also, but I think it  
7 will be easier right now to use the motion itself  
8 and the incorporated timeline as a point of  
9 reference.

10 And so, Judge, I really am starting at point  
11 zero. I'm going to try, because I know to the  
12 extent the Court has not read that, the Court will  
13 read it, because you read everything and you have  
14 throughout this case.

15 Judge, to sort of cut to the chase on the  
16 predicate for the motion, for the last two and a  
17 half years or so, Gawker has tried throughout this  
18 case, both in discovery, both in front of  
19 Judge Case, your appointed discovery master, and in  
20 this Court, to inject issues relating to a separate  
21 tape that is at -- than the one that is at issue in  
22 this case, that they've alleged contains offensive  
23 language engaged in by my client. They've tried.  
24 They've tried at depositions. I've sat there and watched  
25 them try and watched Judge Case stop them time and

## REPORTER'S CERTIFICATE

STATE OF FLORIDA

COUNTY OF HILLSBOROUGH

I, Valerie A. Hance, Registered Professional Reporter, certify that I was authorized to and did stenographically report the foregoing proceedings and that the transcript is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the outcome of the foregoing action.

Dated this 30th day of July, 2015, IN THE CITY OF TAMPA, COUNTY OF HILLSBOROUGH, STATE OF FLORIDA.

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Valerie A. Hance, RPR