

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

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

vs.

Case No. 12012447CI-011

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,

Defendants.

_____ /

STIPULATED MOTION TO REMOVE PARTIES FROM CAPTION

Plaintiff, Terry Bollea, professionally known as Hulk Hogan, and Defendants, Gawker Media, LLC, Nick Denton, and A.J. Daulerio, hereby stipulate and jointly move to remove several parties from the caption in this proceeding and state in support as follows:

1. Trial is currently set for March 7, 2016, on Terry Bollea's claims against Defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio.

2. Defendants, Gawker Media Group, Inc. aka Gawker Media, Gawker Entertainment, LLC, Gawker Technology, LLC, Kate Bennert, and Blogwire Hungary Szellemi Alkotast Hasznosito KFT aka Gawker Media, have been dismissed from the case, and, for good cause, should be removed from the caption of this case. Defendant, Heather Clem, has settled with the Plaintiff and, for good cause, should also be removed from the caption of this case.

3. Accordingly, the caption in this case should be amended to reflect as named Defendants only Gawker Media, LLC, Nick Denton, and A.J. Daulerio, and the other named defendants should be deleted from the caption.

4. Therefore, the parties respectfully request an order directing the clerk to change the case caption and directing that all future pleadings and orders in this case shall reflect the amended caption.

Dated: 10/21/15

/s/ Charles J. Harder
Charles J. Harder, Esq.
PHV No. 102333
HARDER MIRELL & ABRAMS LLP
132 S. Rodeo Dr.—Ste. 301
Beverly Hills, CA 90212
Tel: (424) 203-1600
Fax: (424) 203-1601
Email: charder@hmafirm.com
Counsel for Plaintiff Terry Bollea

Dated: 10/21/15

/s/ Seth D. Berlin
Seth D. Berlin
PHV No. 103440
LEVINE SULLIVAN KOCH & SCHULTZ, LLP
1899 L Street NW, Suite 200
Washington, DC 20036
Tel: (202) 508-1122
Fax: (202) 861-9888
Email: sberlin@lskslaw.com
Counsel for Defendants Gawker Media, LLC,
Nick Denton, and A.J. Daulerio

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by e-mail via the e-portal system this 21st day of October, 2015 to the following:

Barry A. Cohen, Esquire
Michael W. Gaines, Esquire
The Cohen Law Group
201 E. Kennedy Blvd., Suite 1950
Tampa, Florida 33602
bcohen@tampalawfirm.com
mgaines@tampalawfirm.com
jhalle@tampalawfirm.com
mwalsh@tampalawfirm.com
Counsel for Heather Clem

David R. Houston, Esquire
Law Office of David R. Houston
432 Court Street
Reno, NV 89501
dhouston@houstonatlaw.com
krosser@houstonatlaw.com

Michael Berry, Esquire
Levine Sullivan Koch & Schultz, LLP
1760 Market Street, Suite 1001
Philadelphia, PA 19103
mberry@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

Kirk S. Davis, Esquire
Shawn M. Goodwin, Esquire
Akerman LLP
401 E. Jackson Street, Suite 1700
Tampa, Florida 33602
kirk.davis@akerman.com
shawn.goodwin@akerman.com
Co-Counsel for Gawker Defendants

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

Gregg D. Thomas, Esquire
Rachel E. Fugate, Esquire
Thomas & LoCicero PL
601 S. Boulevard
Tampa, Florida 33606
gthomas@tlolawfirm.com
rfugate@tlolawfirm.com
kbrown@tlolawfirm.com
abcenc@tlolawfirm.com
Counsel for Gawker Defendants

Seth D. Berlin, Esquire
Paul J. Safier, Esquire
Alia L. Smith, Esquire
Michael D. Sullivan, Esquire
Levine Sullivan Koch & Schulz, LLP
1899 L. Street, NW, Suite 200
Washington, DC 20036
sberlin@lskslaw.com
psafier@lskslaw.com
asmith@lskslaw.com
msullivan@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

Allison M. Steele
Rahdert, Steele, Reynolds & Driscoll, P.L.
535 Central Avenue
St. Petersburg, FL 33701
amnestee@aol.com
asteelc@rahdertlaw.com
ncampbell@rahdertlaw.com
*Attorneys for Intervenor Times Publishing
Company*

charles.tobin@hklaw.com

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

/s/ Kenneth G. Turkel

Attorney