

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.

GAWKER MEDIA, LLC aka GAWKER
MEDIA; NICK DENTON; A.J. DAULERIO,

Defendants.

NOTICE OF PRODUCTION FROM NON-PARTY

YOU ARE NOTIFIED that after ten (10) days from the date of service of this notice, service being made by facsimile, and if no objection is received from any party, the undersigned will issue or apply to the clerk of this court for issuance of the attached subpoenas directed to the Records Custodians of the following:

JP Morgan Chase Bank, N.A.
300 North Franklin Street
Tampa, FL 33602

who are not parties to this cause of action, to produce the items listed at Bajo Cuva Cohen & Turkel, P.A., 100 North Tampa Street, Suite 1900, Tampa, Florida 33602.

/s/ Shane B. Vogt

Kenneth G. Turkel, Esq. – FBN 867233

Shane B. Vogt – FBN 0257620

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-and-

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by e-mail via facsimile and the e-portal system this 18th day of August, 2016 to the following:

Gregg D. Thomas, Esquire
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*Pro Hac Vice Counsel for
Gawker Defendants*

/s/ Shane B. Vogt

Attorney

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Defendants.

SUBPOENA DUCES TECUM WITHOUT DEPOSITION

THE STATE OF FLORIDA:

To: Records Custodian
JP Morgan Chase Bank, N.A.
300 North Franklin Street
Tampa, FL 33602

YOU ARE COMMANDED to appear at Bajo Cuva Cohen & Turkel, P.A., 100 North Tampa Street, Suite 1900, Tampa, Florida 33602, on **September 12, 2016 at 10:00 a.m.** and to have with you at that time and place the following:

SEE EXHIBIT "A"

It is the intent of the this subpoena that each and every document and thing in your care, custody, or control, or available to you, no matter how insignificant that item may appear to the party to whom this subpoena is directed, be produced.

This subpoena encompasses all documents and things, regardless of how old, including anything that might be on microfilm/micro-fiche or kept at another location.

To comply with the subpoena, you are to produce each and every document or thing which has ever been a part of your file. If any document or thing is not produced, you are to identify that document or thing by date, title, author, and recipient; and identify the person, pursuant to whose instruction the documents or things were not produced, by name, address and employer.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. **You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above.** You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. **THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.**

If you fail to:

- (1) appear as specified; or
- (2) furnish the records instead of appearing as provided above; or
- (3) object to this subpoena

You may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

****RECORDS CUSTODIAN – PLEASE COMPLETE ATTACHED AFFIDAVIT****

PLEASE GOVERN YOURSELF ACCORDINGLY.

DATED on August 29, 2016.

For the Court

Kenneth G. Turkel, Esq. – FBN 867233
Shane B. Vogt – FBN 0257620
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-and-

Charles J. Harder, Esq. – PHV No. 102333
HARDER MIRELL & ABRAMS LLP
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Email: charder@hmafirm.com

RECORDS CUSTODIAN CERTIFICATION OF RECORDS

RECORDS PROVIDER: Regions Bank

Date: _____, 2016.

TO: Bajo Cuva Cohen & Turkel, P.A.
100 North Tampa Street, Suite 1900
Tampa, Florida 33606

RE: records and reports as described in EXHIBIT "A"

I, _____, as custodian of the records and reports of the above named, hereby certify that the enclosed records described in **EXHIBIT "A"** consisting of _____ photocopied pages, are correct copies of the records maintained in a designated record set that were made at or near the time of the occurrence by a person with knowledge of the matters therein, and that the records were kept in the course of regularly conducted business activity and made as a regular practice in the course of the regularly conducted business activity.

Signature of Records Custodian

SWORN TO AND SUBSCRIBED before me this ___ day of _____, 2016.

Notary Public, State of Florida

[Seal]

EXHIBIT "A"

1. Any and all documents in your possession relating to **any account of Albert J. Daulerio a/k/a "A.J. Daulerio", from October 1, 2012 to the present date**, including without limitation, the following:
 - A. Monthly bank statements
 - B. Account opening documentation
 - C. Signature cards
 - D. Cancelled checks
 - E. Debit and credit memoranda
 - F. Deposit and withdrawal slips
 - G. Wire transfer confirmations
 - H. Transmittal notices
 - I. Overdraft statements
 - J. Cashier's checks
 - K. Counter checks
 - L. Correspondence and internal memoranda
 - K. Monthly interest payment notices