

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; et al.,

Defendants,

and

JP MORGAN CHASE BANK, N.A.,

Garnishee.

**DEFENDANT A.J. DAULERIO'S
CLAIM OF EXEMPTION**

Pursuant to Fla. Stat. § 77.041, and in response to this Court's August 2, 2016 order directing the Clerk of the Court to issue a writ of garnishment on JP Morgan Chase Bank, N.A. as garnishee (the "Garnishee"),¹ I, A.J. Daulerio, claim that my account at JP Morgan Chase Bank, N.A. (the "Account") is exempt from garnishment.

The Account—containing \$1,505.78 and currently frozen as a result of the writ of garnishment served on the Garnishee—is exempt from garnishment under Fla. Const. Art. X, § 4(a)(2) and Fla. Stat. § 222.25(4), which together exempt up to \$5,000 in personal property. I

¹ I received notice of service of the writ of garnishment on August 4, 2016.

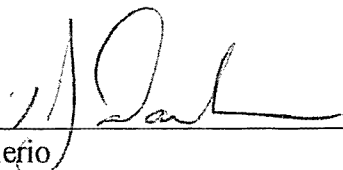
am not claiming or receiving the benefit of a homestead exemption. I moved to Florida in May of 2016 and leased an apartment. Prior to moving to Florida, I lived in New York State for approximately six years and still have my New York driver's license. I explained to Plaintiff's counsel during the deposition in aid of execution taken on August 17, 2016 that I intend to move to California imminently to pursue a job opportunity.²

If for any reason Florida law does not apply, then I claim that \$1,000 of the Account is exempt under New York law. *See* N.Y. C.P.L.R. § 5205(a)(9) (providing that "one thousand dollars in personal property, bank account or cash" is exempt from application to the satisfaction of money judgments "if no homestead exemption is claimed").

I do not request a hearing to decide the validity of this claim. If Plaintiff objects to this Claim of Exemption and requests a hearing, a copy of Plaintiff's objection and notice of hearing on same should be given to me courtesy of Levine Sullivan Koch & Schulz, LLP, Attn: Michael Berry, 1760 Market Street, Suite 1001, Philadelphia, PA 19103.

The statements made in this Claim of Exemption are true to the best of my knowledge and belief.

08/23/16
Date

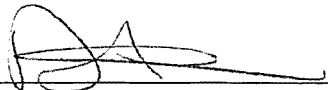

A.J. Daulerio

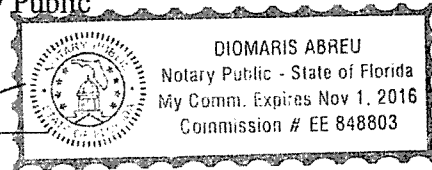
STATE OF Florida

COUNTY OF Palm Beach

SWORN TO AND SUBSCRIBED before me by A.J. Daulerio this 23 day of August, 2016.

² *See* Exhibit A (correspondence from my counsel notifying plaintiff's counsel of my upcoming move and addressing my personal property in Florida).


Notary Public



Personally Known _____ OR Produced Identification _____

Type of Identification Produced Ag; DL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of August 2016, I caused a true and correct copy of the foregoing to be served via the Florida Courts' E-Filing Portal upon the following counsel of record, and to be furnished via hand-delivery on the Garnishee and on Plaintiff's counsel at Bajo Cuva Cohen & Turkel, P.A.:

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/s/ Gregg D. Thomas
Attorney