

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

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Case No. 12012447 CI-011

Plaintiff,

vs.

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

Defendants.

_____ /

**NOTICE TO DEFENDANT, A.J. DAULERIO, TO
PRODUCE DOCUMENTS AT OCTOBER 31, 2016 HEARING**

PLEASE TAKE NOTICE that, pursuant to Rule 1.410, *Fla. R. Civ. P.*, Defendant, A.J. Daulerio, is hereby commanded to produce the following document(s) at the hearing scheduled before the Honorable Pamela A.M. Campbell at the St. Petersburg Judicial Building, 545 First Avenue North, Room 300, St. Petersburg, Florida 33701 on **October 31, 2016 at 1:30 p.m.**, for purposes of the evidentiary hearing scheduled on Plaintiff's Amended Motion for Sanctions and for Order to Show Cause Against Daulerio and His Counsel, as well as for a possible *in camera* review by the Court if any privilege objections are raised:

Document(s) to be Produced:

See Exhibit A

Good cause exists for the production of these documents at the October 31, 2016 hearing, including their relevance and use as evidence concerning Plaintiff's Amended Motion for Sanctions and for Order to Show Cause Against Daulerio and His Counsel, which is incorporated herein by reference.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

/s/ Shane B. Vogt

Kenneth G. Turkel, Esq.
Florida Bar No. 867233
Shane B. Vogt
Florida Bar No. 0257620
BAJO | CUVA | COHEN | TURKEL
100 North Tampa Street, Suite 1900
Tampa, Florida 33602
Tel: (813) 443-2199
Fax: (813) 443-2193
Email: kturkel@bajocuva.com
Email: svogt@bajocuva.com

-and-

Charles J. Harder, Esq.
PHV No. 102333
HARDER MIRELL & ABRAMS LLP
132 South Rodeo Drive, Fourth Floor
Beverly Hills, CA 90212-2406
Tel: (424) 203-1600
Fax: (424) 203-1601
Email: charder@hmafirm.com
Attorneys for Plaintiff

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 14th day of October, 2016 to the following:

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
abeene@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*

Steven L. Brannock, Esquire
Celene H. Humphries, Esquire
Brannock & Humphries
1111 West Cass Street, Suite 200
Tampa, FL 33606
sbrannock@bhappeals.com
chumphries@bhappeals.com
eservice@bhappeals.com
Co-Counsel for Gawker Defendants

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

Andrew B. Greenlee, Esquire
Greenlee, P.A.
401 E. 1st Street, Unit 261
Sanford, FL 32772
Tel: (407) 808-6411
andrew@andrewgreenleelaw.com

David Marburger, Esquire
Marburger Law LLC
14650 Detroit Avenue, Suite 450
Cleveland, OH 44107
Tel: (216) 930-0500
david@marburger-law.com
Counsel for A. J. Daulerio

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*

Stuart C. Markman, Esquire
Kristin A. Norse, Esquire
Kynes, Markman & Felman, P.A.
Post Office Box 3396
Tampa, Florida 33601
smarkman@kmf-law.com
knorse@kmf-law.com
plawhead@kmf-law.com
Appellate Co-Counsel for Plaintiff

/s/ Shane B. Vogt
Attorney

EXHIBIT A

1. All documents in which Mr. Daulerio was advised at the outset of this case that his counsel of record could not advise him about indemnification rights against Gawker, as stated in Footnote 2 of Mr. Daulerio's 8/9/16 Objection to Notice of Hearing.
2. All correspondence, e-mails, texts, message, chats or other written communications in any form, between Mr. Daulerio and Nick Denton, Heather Dietrick and/or any other agent or employee of Gawker Media, LLC ("Gawker"), Gawker Media Group, Inc. ("GMGI") and/or Kinja, Kft. ("Kinja"), concerning, referencing and/or discussing Mr. Daulerio's indemnity rights from or against Gawker, GMGI and/or Kinja arising out of this case.
3. All documents evidencing any demand made or notice provided by Mr. Daulerio to Gawker, GMGI and/or Kinja pursuant to his indemnity rights arising out of this case.
4. All correspondence, e-mails, texts, messages, chats or other written communications in any form, between Mr. Daulerio and any other person prior to June 11, 2016, which concern, reference or discuss Gawker, GMGI and/or Kinja filing for bankruptcy protection.
5. All correspondence, e-mails, text messages, chats or other written communications in any form between Mr. Daulerio and LSKS, which concern, reference or discuss Mr. Daulerio's indemnity rights from or against Gawker, GMGI and/or Kinja for the payment of any final judgment awarded in this case.
6. All drafts of any financial affidavit filed by Mr. Daulerio in this case, including metadata.
7. All documents evidencing, supporting or otherwise reflecting, with respect to the statement Mr. Daulerio made on or about September 28, 2016, in an interview on the *Longform Podcast*, that "they need me to remember things in a certain way:"
 - A) the identity(ies) of who "need[ed] [you] to remember things in a certain way;" and
 - B) what "things" they needed you to remember in a certain way.