

**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. 1201447-CI-011**

**vs.**

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

**Defendants.**

**VERIFIED MOTION OF DAVID MARBURGER FOR ADMISSION TO  
APPEAR PRO HAC VICE UNDER FLORIDA RULE OF JUDICIAL  
ADMINISTRATION 2.510**

Movant David Marburger hereby respectfully requests admission in this Court to appear *pro hac vice* in this action based on the following grounds:

1. David Marburger resides in Cleveland, Ohio and is not a resident of the State of Florida.
2. David Marburger is an attorney and a member of the law firm of Marburger Law LLC, with offices at 14650 Detroit Avenue, Suite 450, Cleveland, Ohio 44107, Telephone: 216-930-0500.
3. David Marburger has been retained personally and as a member of Marburger Law LLC during September 2016, by Albert James Daulerio, a/k/a A.J. Daulerio to provide legal representation in connection with the above-styled matter

now pending before this Court.

4. David Marburger is an active member in good standing and currently eligible to practice law in the following jurisdictions:

Ohio: Attorney Bar No. 0025747

Pennsylvania: Attorney Bar No. 40420

5. There have been no disciplinary, suspension, disbarment, or contempt proceedings initiated against David Marburger in the preceding 5 years.

6. David Marburger, either by resignation, withdrawal, or otherwise, never has terminated or attempted to terminate his office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings.

7. David Marburger is not an inactive member of The Florida Bar.

8. David Marburger is not now a member of The Florida Bar.

9. David Marburger is not a suspended member of The Florida Bar.

10. David Marburger is not a disbarred member of The Florida Bar nor has David Marburger received a disciplinary resignation from The Florida Bar.  
Correct.

11. David Marburger has not previously been disciplined or held in contempt by reason of misconduct committed while engaged in representation pursuant to Florida Rule of Judicial Administration 2.510.

12. David Marburger has only moved to appear as counsel in Florida state

courts once during the past five (5) years, and that motion was filed yesterday in the Second District Court of Appeal in Case No. 2D16-3721, an interlocutory appeal arising out of this case.

13. Local counsel of record associated with David Marburger in this matter is Andrew B. Greenlee, Florida Bar Number 96365, who is an active member in good standing of The Florida Bar and has offices at: Andrew B. Greenlee, P.A., 401 E. 1<sup>st</sup> Street, Unit 261, Sanford, Florida 32772, Tel: 407-808-6411, [andrew@andrewgreenleelaw.com](mailto:andrew@andrewgreenleelaw.com).

14. David Marburger has read the applicable provisions of Florida Rule of Judicial Administration 2.510 and Rule 1-3.10 of the Rules Regulating The Florida Bar and certifies that this verified motion complies with those rules.

15. David Marburger agrees to comply with the provisions of the Florida Rules of Professional Conduct and consents to the jurisdiction of the courts and the Bar of the State of Florida.

WHEREFORE, David Marburger respectfully requests permission to appear in this Court for this cause only.

DATED this 7th day of October, 2016.

*/s/ David Marburger*  
MARBURGER LAW LLC  
14650 Detroit Avenue, Suite 450  
Cleveland, OH 44107  
Tel: 216-930-0500  
email: [david@marburger-law.com](mailto:david@marburger-law.com)

STATE OF OHIO

COUNTY OF

CUYAHOGA

I, David Marburger, do hereby swear or affirm under penalty of perjury that I am the Movant in the above-styled matter; that I have read the foregoing Motion and know the contents thereof, and the contents are true of my own knowledge and belief.

/s/ David Marburger  
Movant

**VERIFICATION OF LOCAL COUNSEL**

I hereby consent to be associated as local counsel of record in this cause pursuant to Florida Rule of Judicial Administration 2.510.

DATED this 7th day of October, 2016.

/s/ Andrew B.  
Greenlee Florida Bar  
No. 96365 Andrew B.  
Greenlee, P.A. 401 E.  
1st Street, Unit 261  
Sanford, FL 32772  
Tel: 407-808-6411  
andrew@andrewgreenleelaw.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing motion was served by mail to PHV Admissions, The Florida Bar, 651 East Jefferson Street, Tallahassee, Florida, 32399-2333 accompanied by payment of the \$250.00 filing fee made payable to The Florida Bar, and also was served via email on counsel of record listed below:

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*Counsel for defendants*

/s/ David Marburger  
Movant