

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 and A.J. DAULERIO,

Defendants.

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**MOTION FOR ISSUANCE OF LETTERS ROGATORY TO REQUEST  
DOCUMENTS FROM GEOFFREY DENTON, ADRIAN WILHELM WEINBRECHT  
AND REBECCA DENTON WEINBRECHT IN UNITED KINGDOM**

Plaintiff hereby moves this Honorable Court, pursuant to Florida Rules of Civil Procedure 1.300(b) and this Court's Order granting in part Mr. Bollea's motion to compel additional financial worth discovery, for the issuance of letters rogatory requesting the appropriate official in the United Kingdom to appoint some component person or officer as the person before whom the documents requested in the Subpoenas Duces Tecum Without Deposition to Geoffrey Denton, Adrian Wilhelm Weinbrecht and Rebecca Denton Weinbrecht will be provided.

This motion is made on the grounds that Geoffrey Denton, Adrian Wilhelm Weinbrecht and Rebecca Denton Weinbrecht are outside of the state of Florida and, pursuant the Court's ruling on November 18, 2015, Plaintiff is entitled to seek from them documents relating to the holdings of Mr. Denton's family in Gawker Media Group, Inc.

DATED: December 22, 2015.

/s/ Kenneth G. Turkel

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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 the e-portal system this 22nd day of December, 2015 to the following:

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

TERRY GENE BOLLEA professionally  
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NICK DENTON and A.J. DAULERIO,

Defendants.

\_\_\_\_\_/

**ORDER FOR ISSUANCE OF LETTERS ROGATORY TO REQUEST  
DOCUMENTS FROM GEOFFREY DENTON, ADRIAN WILHELM  
WEINBRECHT AND REBECCA DENTON WEINBRECHT IN UNITED KINGDOM**

THIS CAUSE came before the Court on January 13, 2016, upon Plaintiff's Motion for Issuance of Letters Rogatory to Request Documents from Geoffrey Denton, filed December 22, 2015.

Proof having been made to the satisfaction of the Court, and good cause appearing therefor, it is ordered that letters rogatory issue out of and under the seal of this Court addressed to the appropriate authority in the United Kingdom to demand from Geoffrey Denton, Adrian Wilhelm Weinbrecht and Rebecca Denton Weinbrecht the documents outlined in Plaintiff's subpoenas to same.

DONE and ORDERED in Chambers at Pinellas County, Florida, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

\_\_\_\_\_  
Judge Pamela A.M. Campbell

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
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TERRY GENE BOLLEA professionally  
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Defendants.

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**LETTER OF REQUEST FOR EXAMINATION OUT OF THE JURISDICTION**

To the Senior Master of the Queen's Bench Division, Royal Courts of Justice, London:

I, Pamela A.M. Campbell, Circuit Court Judge in Pinellas County, Florida, in conformity with the United Kingdom's Evidence (Proceedings in Other Jurisdictions) Act 1975 and Article 3 of The Hague Convention, respectfully request the assistance of your Court with regard to the following matters.

1. Case Description:

*Terry Bollea v. Gawker Media, LLC, Nick Denton and A.J. Daulerio*

Case Number: 12012447-CI-011

2. Legal Representatives:

The names and addresses of the legal representatives of the parties are as follows:

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NICK DENTON, AND A.J. DAULERIO

3. Description of the Matter:

The case before the Court concerns the publication of a video of the Plaintiff, Mr. Bollea, engaged in sexual activity, posted on the website Gawker.com (the “Gawker Website”). The Gawker Website is controlled and operated by Defendant Gawker Media, LLC, a company founded and run by Defendant, Nick Denton. Drafting of the accompanying article and the supervision of the editing and posting of the video was completed by Defendant A.J. Daulerio.

Upon a Motion requesting same, Mr. Bollea was given permission by this Court to seek an award of punitive damages against the Defendants. As part thereof, Mr Bollea has engaged in discovery of the financial worth of the Defendants, including the assets of Mr. Denton. On Motion and oral argument, Mr. Bollea has shown this Court that he has sufficient reason to believe that Defendant, Nick Denton, transferred, directly or indirectly stock in the company Gawker Media Group, Inc. into a family trust based in the United Kingdom. Defendant Nick Denton has stated that he does not have access to the trust documents or to the stock itself. This Court has given Mr. Bollea permission to seek the information he requires from the trustees, grantors, protectors and other people involved in the operation of the trust.

4. It is necessary for the purposes of justice and for the due determination of the matters in dispute between the parties that you cause the following witnesses, who are resident

within your jurisdiction, to be compelled to produce evidence to allow the Plaintiff to best pursue the punitive damages element of his claim. The names and addresses of the witnesses are as follows:

- a. GEOFFREY DENTON  
11 Oakhill Avenue  
Hampstead  
London NW3 7RD
- b. ADRIAN WILHELM WEINBRECHT  
11 Oakhill Avenue  
Hampstead  
London NW3 7RD
- c. REBECCA DENTON WEINBRECHT  
(Possibly known as or previously named Eva Rebecca Weinbrecht or Eva  
Rebecca Denton)  
11 Oakhill Avenue  
Hampstead  
London NW3 7RD

5. The witnesses should be compelled to produce the documents outlined in the attached subpoenas duces tecum without depositions. The witnesses shall be afforded the protection of the law and procedure as outlined in the Florida Rules of Civil Procedure, and are permitted to designate any and all documents produced as “Confidential” as outlined in the attached Agreed Protective Order Governing Confidentiality entered by this Court on 25<sup>th</sup> July, 2013, a copy of which is attached to the subpoenas. This “Confidential” designation will protect the records from public disclosure without prior Court approval.

6. The documents requested are necessary to the determination of triable issues, including, without limitation, the determination of punitive damages should Mr. Bollea prevail in terms of liability and entitlement to punitive damages.

7. I request that you cause all documents produced by said witnesses to be duly marked for identification and that you will be further pleased to authenticate such documents by

the seal of your court or in such way as is in accordance with your procedure and return the documents produced to me addressed as follows:

Judge Pamela A. M. Campbell  
Rm. 300, 545 First Avenue North  
St. Petersburg, FL 33701

8. Alternatively, the witnesses are permitted by this Court to provide the documents directed to Plaintiff's UK-based solicitor:

Magnus Boyd, Esq.  
Schillings,  
41 Bedford Square,  
London WC1B 3HX.

9. No examination of the witnesses, other than by the above outlined production of documents, is currently expected to take place.

DONE and ORDERED in Chambers in Pinellas County, Florida this 13th day of January, 2016.

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Pamela A.M. Campbell  
Circuit Court Judge

Copies furnished to:  
Counsel of Record