

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

TERRY GENE BOLLEA professionally  
known as HULK HOGAN,

Plaintiff,

vs.

Case No. 12012447CI-011

HEATHER CLEM; GAWKER MEDIA, LLC  
aka GAWKER MEDIA; GAWKER MEDIA  
GROUP, INC. aka GAWKER MEDIA;  
GAWKER ENTERTAINMENT, LLC;  
GAWKER TECHNOLOGY, LLC; GAWKER  
SALES, LLC; NICK DENTON; A.J.  
DAULERIO; KATE BENNERT, and  
BLOGWIRE HUNGARY SZELLEMI  
ALKOTAST HASZNOSITO KFT aka  
GAWKER MEDIA,

Defendants.

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**PLAINTIFF'S MOTION FOR  
EXTENSION OF TIME TO EFFECTUATE SERVICE**

Plaintiff, Terry Gene Bollea, professionally known as Hulk Hogan (“Bollea”) pursuant to Rule 1.070(j) of the Florida Rules of Civil Procedure hereby respectfully requests that this Court extend the time for Plaintiff to effectuate service upon Defendants, Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, Nick Denton, Kate Bennert and Blogwire Hungary Szellemi Alkotast Hasznosito KFT by an additional one hundred twenty (120) days. In support of this Motion, Plaintiff states as follows:

1. Plaintiff’s Complaint was filed on October 15, 2012. Plaintiff amended his Complaint adding additional defendants Gawker Media, LLC, Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, Nick Denton, A.J.

\*\*\*ELECTRONICALLY FILED 4/16/2013 2:27:59 PM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY\*\*\*

Daulerio, Kate Bennert and Blogwire Hungary Szellemi Alkotast Hasznosito KFT on December 28, 2012.

2. On January 2, 2013, defendant Gawker Media, LLC removed this action to the United States District Court, Middle District of Florida, Tampa Division, designated as Case No. 8:13-cv-1-T-26AEP.

3. On March 28, 2013, the United States District Court granted Plaintiff's Motion to Remand, and the case was remanded back to the Sixth Judicial Circuit Court in Pinellas County, Florida.

4. The Clerk of Circuit Court of Pinellas County received a certified copy of the Order of Remand on April 8, 2013.

5. Gawker Media Group, Inc. is located in the Cayman Islands and is subject to service under the Hague Convention.

6. Blogwire Hungary Szellemi Alkotast Hasznosito KFT is located in Budapest, Hungary and is subject to service under the Hague Convention.

7. Personal service attempts have been made on Nick Denton and Kate Bennert but have been unsuccessful.

8. Service attempts on dissolved corporations, Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC are pending.

9. Plaintiff believes this extension should cause no prejudice to any of the Defendants.

10. This motion is made in good faith and is not interposed for the purposes of delay.

Wherefore, in light of the good cause that exists because of the removal and remand of this action, translation of summons, complaint and amended complaint required pursuant to the Hague Convention and other Hague Service requirements, Plaintiff respectfully requests that this Court enter an Order granting a 120-day extension of time to serve process on Defendants Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, Nick Denton, Kate Bennert and Blogwire Hungary Szellemi Alkotast Hasznosito KFT.

Respectfully submitted,



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-and-

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(Pro Hac Vice Application pending)

Counsel for Plaintiff


**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via e-mail this 16<sup>th</sup> day of April, 2013 to the following:

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