## 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. 12012447CI-011

VS.

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.



# VERIFIED MOTION FOR ADMISSION TO APPEAR PRO HAC VICE PURSUANT TO FLORIDA RULE OF JUDICIAL ADMINSTRATION 2.510

Comes now David R. Houston, Esquire, Movant herein, and respectfully represents the following:

- 1. Movant resides in Reno, Nevada. Movant is not a resident of the State of Florida.
- 2. Movant is an attorney and a member of the Law Office of David R. Houston, 432

  Court Street, Reno, Nevada 89501, Telephone (775) 786-4188, Facsimile (775)

  786-5091.
- 3. Movant has been retained personally or as a member of the above named law firm on March 13, 2013 by Terry Bollea to provide legal representation in connection

- with the above-styled matter now pending before the above-named court of the State of Florida.
- 4. Movant is an active member in good standing and currently eligible to practice law in the following jurisdictions: United States District Court, District of Nevada, United States District Court, Central and Eastern Districts of California, United States Ninth Circuit Court of Appeals, State of Colorado (Bar #28318) and the State of Nevada (Bar # 2131).
- 5. There are no disciplinary proceedings pending against Movant.
- 6. Within the past five (5) years, Movant has not been subject to any disciplinary proceedings.
- 7. Movant has never been subject to any suspension proceedings.
- 8. Movant has never been subject to any disbarment proceedings.
- 9. Movant, either by resignation, withdrawal, or otherwise, never has terminated or attempted to terminate Movant's office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings.
- 10. Movant is not an inactive member of The Florida Bar.
- 11. Movant is not now a member of The Florida Bar.
- 12. Movant is not a suspended member of The Florida Bar.
- 13. Movant is not a disbarred member of The Florida Bar nor has Movant received a disciplinary resignation from The Florida Bar.
- 14. Movant 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.

- 15. Movant has not filed any motion(s) to appear as counsel in Florida state courts during the past five (5) years.
- 16. Local counsel of record associated with Movant in this matter is Kenneth G. Turkel, Esquire who is an active member in good standing of The Florida Bar and has offices at 100 North Tampa Street, Suite 1900, Tampa, Florida 33602, Telephone (813) 443-2199, Facsimile (813) 443-2193.
- 17. Movant 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.
- 18. Movant 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, Movant respectfully requests permission to appear in this court for this cause only.

DATED this 2<sup>nd</sup> day of April, 2013.

David R. Houston, Esquire

The Law Office of David R. Houston

432 Court Street

Reno, Nevada 89501

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Email: dhouston@houstonatlaw.com

#### STATE OF NEVADA

#### **COUNTY OF WASHOE**

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

David R. Houston, Esquire

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 \_\_\_\_\_\_ day of April, 2013.

Kenneth G. Turkel, Esq.

BAJO CUVA COHEN & TURKEL, P.A.

100 North Tampa Street, Suite 1900

Tampa, Florida 33602 Tel: (813) 443-2199

Fax: (813) 443-2193

Florida Bar No. 867233

Email: kturkel@bajocuva.com

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing motion was furnished by U.S. 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, to Barry A. Cohen, Esquire via email at <a href="mailto:bcohen@tampalawfirm.com">bcohen@tampalawfirm.com</a>, counsel for Defendant, Heather Clem, to Gregg D. Thomas, Esquire via email at <a href="mailto:gthomas@tlolawfirm.com">gthomas@tlolawfirm.com</a>, counsel for the Gawker Defendants and to Kenneth G. Turkel, Esquire via email at <a href="mailto:kturkel@bajocuva.com">kturkel@bajocuva.com</a> on this <a href="mailto:2013">2013</a>.

David R. Houston, Esquire