

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

KEN BURKE  
CLERK OF CIRCUIT COURT

FILED  
ST. PETERSBURG, FLORIDA  
2013 MAY 23 AM 9:02

TERRY GENE BOLLEA professionally  
known as HULK HOGAN,

Plaintiff,

Case No.: 12012447-CI-011

vs.

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

Defendants.

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**VERIFIED MOTION FOR ADMISSION OF SETH D.  
BERLIN TO APPEAR PRO HAC VICE PURSUANT TO  
FLORIDA RULE OF JUDICIAL ADMINISTRATION 2.510**

Comes now Seth D. Berlin, Movant herein, and respectfully requests the following:

1. Movant resides in Chevy Chase, Maryland. Movant is not a resident of the State of Florida.
2. Movant is an attorney and a member of the law firm of Levine Sullivan Koch & Schulz, LLP, 1899 L Street, NW, Suite 200, Washington, DC 20036, Telephone (202) 508-1122, Facsimile (202) 861-9888.
3. Movant has been retained personally, or as a member of the above named law firm, on or about December 28, 2012 by Gawker Media, LLC to provide legal representation in connection with the above-styled matter now pending before the above-named court of the State of Florida (following which the action was immediately removed to federal court and then remanded to the above-named court on March 28, 2013), have since been retained by defendant A.J. Daulerio (who was first served on April 11, 2013), and will also represent defendants

Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, Nick Denton, and Kate Bennert upon service of suit papers in this action by plaintiff (collectively, the “Gawker Defendants”).

4. Movant is an active member in good standing and currently eligible to practice law in the following jurisdictions: Supreme Court of the United States, United States Courts of Appeal for the Fourth, Ninth, Eleventh and District of Columbia Circuits, the United States Court of Appeals for the Armed Forces, the United States District Courts for the District of Columbia, the District of Maryland, and the Eastern and Southern District of New York, and the states of Maryland, New York, as well as District of Columbia.

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 to appear as counsel in Florida State courts during the past five (5) years, but is contemporaneously moving to appear *pro hac vice* on behalf of Gawker Media, LLC in connection with an appeal in this action, as reflected below.

**Case Name:** Gawker Media, LLC v. Bollea

**Case Number:** 2D13-1951

**Court:** District Court of Appeal of the State of Florida, Second District

**Date Motion Granted:** pending

16. Local counsel of record associated with Movant in this matter is Gregg D. Thomas, Esquire who is an active member in good standing of The Florida Bar and has offices at 601 South Boulevard, P.O. Box 2602 (33601), Tampa, Florida 33606, Telephone (813) 984-3060, Facsimile (813) 984-3070.

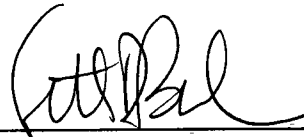
17. Movant has read the applicable provisions of Florida Rule of Judicial Administration 2.510 and Rule 1-3.10 of the Rules Regulating The Florida Bar and certifies that this verified motion complies with those rules.

18. Movant agrees to comply with the provisions of the Florida Rules of the 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 15<sup>th</sup> day of May, 2013

Respectfully submitted,

By:   
Seth D. Berlin

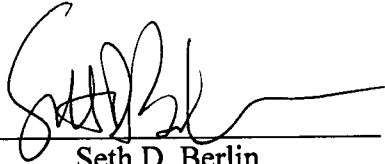
LEVINE SULLIVAN KOCH & SCHULZ, LLP  
1899 L Street, NW, Suite 200  
Washington, DC 20036  
Telephone: (202) 508-1122  
Facsimile: (202) 861-9888

*Counsel for Gawker Defendants*

**District of Columbia**

**City of Washington**


I, Seth D. Berlin, 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 knowledge and belief.

  
\_\_\_\_\_  
Seth D. Berlin

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 17<sup>th</sup> day of May, 2013.

THOMAS & LOCICERO PL

By:   
\_\_\_\_\_  
Gregg D. Thomas

Florida Bar No.: 223913  
601 South Boulevard  
P.O. Box 2602 (33601)  
Tampa, FL 33606  
Telephone: (813) 984-3060  
Facsimile: (813) 984-3070

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 17<sup>th</sup> day of May 2013, 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, FL 32399-2333 accompanied by payment of the \$250.00 filing fee made payable to The Florida Bar. I further certify that a true and correct copy of the foregoing has been furnished via email and U.S. Mail the 17<sup>th</sup> day of May 2013, the following counsel of record:

Kenneth G. Turkel, Esq.  
[kturkel@BajoCuva.com](mailto:kturkel@BajoCuva.com)  
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Barry A. Cohen Law Group

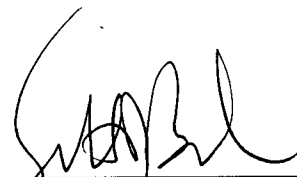
201 East Kennedy Boulevard, Suite 1000

Tampa, FL 33602

Tel: (813) 225-1655

Fax: (813) 225-1921

*Attorneys for Defendant Heather Clem*

A handwritten signature in black ink, appearing to read "Seth D. Berlin", written over a horizontal line.

Seth D. Berlin