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.

AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF HEATHER CLEM a/k/a HEATHER COLE

PLEASE TAKE NOTICE that Plaintiff Terry Gene Bollea, by and through the undersigned attorney, will take the deposition of Defendant HEATHER CLEM, a/k/a Heather Cole, on March 5, 2014, from 9:30 a.m. until completion at Thomas & Locicero PL, 601 South Boulevard, Tampa, FL 33606 upon oral examination, before an official court reporter and/or some other officer duly authorized by law to take depositions.

The deposition is being taken for purposes of discovery, for use at trial and for all other purposes as are permitted under the Florida Rules of Civil Procedure. The deposition shall continue from day to day until completed. The deposition may be recorded by video and/or using instant visual display of the testimony (*e.g.*, Live Note), as well as stenographically.

PLEASE GOVERN YOURSELF ACCORDINGLY.

/s/ Christina K. Ramirez Kenneth G. Turkel, Esq. Florida Bar No. 867233 Christina K. Ramirez, Esq. Florida Bar No. 954497 BAJO CUVA COHEN & TURKEL, P.A. 100 North Tampa Street, Suite 1900 Tampa, Florida 33602 Tel: (813) 443-2199 Fax: (813) 443-2193 Email: <u>kturkel@bajocuva.com</u> Email: cramirez@bajocuva.com

-and-

Charles J. Harder, Esquire PHV No. 102333 Harder Mirell & Abrams LLP 1925 Century Park East, Suite 800 Los Angeles, CA 90067 Tel: (424) 203-1600 Fax: (424) 203-1601 charder@hmafirm.com Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via E-Service mail this 8th day of January, 2014 to the following:

Barry A. Cohen, Esquire Michael W. Gaines, Esquire Barry Cohen, Esquire Michael W. Gaines, Esquire The Cohen Law Group 201 E. Kennedy Blvd., Suite 1000 Tampa, Florida 33602 bcohen@tampalawfirm.com mgaines@tampalawfirm.com jrosario@tampalawfirm.com Counsel for Heather Clem Gregg D. Thomas, Esquire Rachel E. Fugate, Esquire Thomas & LoCicero PL 601 S. Boulevard Tampa, Florida 33606 gthomas@tlolawfirm.com rfugate@tlolawfirm.com kbrown@tlolawfirm.com Counsel for Gawker Defendants David R. Houston, Esquire Law Office of David R. Houston 432 Court Street Reno, NV 89501 dhouston@houstonatlaw.com Seth D. Berlin, Esquire Paul J. Safier, Esquire Alia L. Smith, Esquire Levine Sullivan Koch & Schulz, LLP 1899 L. Street, NW, Suite 200 Washington, DC 20036 <u>sberlin@lskslaw.com</u> <u>psafier@lskslaw.com</u> *Pro Hac Vice Counsel for Gawker Defendants*

<u>/s/ Christina K. Ramirez</u> Attorney