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.

NOTICE OF VIDEOTAPED DEPOSITION

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 10:00 a.m. until completion at the St. Petersburg Judicial Building, located at 545 1st Avenue North, St. Petersburg, Florida 33701 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.

Charles J. Harder, Esq.

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-and-

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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 $\frac{1}{2}$ day of January, 2014 to the following:

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Attorney