## 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.: 12012447-CI-011

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

Defendants.

## **NOTICE OF VIDEOTAPED DEPOSITION OF BUBBA CLEM**

PLEASE TAKE NOTICE, pursuant to Rules 1.310(b)(1) and 1.310(b)(4), Florida Rules

of Civil Procedure, that Defendant Gawker Media, LLC, by and through the undersigned

attorney, will take the deposition testimony of the following:

<b>DEPONENT:</b>	Bubba Clem
DATES:	March 3, 2014 & March 4, 2014
TIME:	12:00 p.m., until completion
PLACE:	St. Petersburg Judicial Building 545 First Avenue North St. Petersburg, FL 33701

upon oral examination, before an officer duly authorized to administer oaths by the laws of the State of Florida, and a person who is neither a relative, nor attorney, nor counsel of any of the parties and who is neither a relative nor employee of such attorney or counsel, and who is not financially interested in the examination. The oral examination will be videotaped by an operator from Riesdorph Reporting Group, 201 North Tampa Street, Suite 712, Tampa, FL 33602, and Defendant Gawker Media, LLC shall bear the initial cost of the videotaping.

This deposition is being taken for the purpose of discovery, and for use at trial, or both of

the foregoing, or for such other purposes as are permitted under the applicable and governing

rules.

Dated: January 7, 2014

Respectfully submitted, THOMAS & LOCICERO PL

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Counsel for Gawker Media, LLC

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 7th day of January 2014, I caused a true and correct copy of the foregoing to be served electronically upon the following counsel of record at their respective email addresses via the Florida Courts E-Filing Portal:

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Attorneys for Non-Party Bubba Clem

Gregg D. Thomas Attorney