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,

Defendar	nts.	

PLAINTIFF'S FIRST SUPPLEMENTAL REQUEST FOR PRODUCTION OF <u>DOCUMENTS TO DEFENDANT AJ DAULERIO</u>

Pursuant to Florida Rules of Civil Procedure 1.350, Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan ("PLAINTIFF") hereby requests that Defendant AJ Daulerio produce for inspection and copying each of the documents or categories of documents described hereafter at the law offices of Bajo Cuva Cohen & Turkel, P.A., 100 North Tampa Street, Suite 1900, Tampa, Florida 33602, on March 3, 2013, at 10:00 a.m.

Pursuant to the provisions of Florida Rule of Civil Procedure 1.350, you are required to produce the documents requested below within thirty days from the certificate of service.

SUPPLEMENTAL DEMAND

For each request for production of documents previously propounded by Terry Bollea to AJ Daulerio in this action, produce any responsive documents within AJ Daulerio's possession, custody, and control which have not previously been produced.

DATED: January 28, 2014

/s/ Charles J. Harder

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

-and-

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: kturkel@bajocuva.com Email: cramirez@bajocuva.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 28th 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

David R. Houston, Esquire Law Office of David R. Houston 432 Court Street Reno, NV 89501 dhouston@houstonatlaw.com

Julie B. Ehrlich, Esquire Levine Sullivan Koch & Schultz, LLP 321 West 44th Street, Suite 1000 New York, NY 10036 jehrlich@lskslaw.com Pro Hac Vice Counsel for Gawker Defendants 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

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
sberlin@lskslaw.com
psafier@lskslaw.com
asmith@lskslaw.com
Pro Hac Vice Counsel for
Gawker Defendants

Michael Berry, Esquire Levine Sullivan Koch & Schultz, LLP 1760 Market Street, Suite 1001 Philadelphia, PA 19103 mberry@lskslaw.com Pro Hac Vice Counsel for Gawker Defendants

> /s/ Christina K. Ramirez Attorney