

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, *et al.*,

Defendants.

NOTICE REGARDING SPECIALLY-APPEARING DEFENDANT KINJA, KFT

PLEASE TAKE NOTICE that, in light of the Notice of Appeal filed on May 27, 2014, by specially-appearing defendant Blogwire Hungary Szellemi Alkotast Hasznosito KFT, now known as “Kinja KFT” (hereinafter “Kinja”), on grounds that this court lacks personal jurisdiction over it, Kinja does not, and is not required to, file an Answer to plaintiff’s First Amended Complaint (the “Complaint”). *See, e.g., Ward v. Gibson*, 340 So. 2d 481, 482 (Fla. 3d DCA 1976) (“We hold that inasmuch as the subject matter of such an interlocutory appeal is the very question of the trial court’s right to proceed with an exercise of jurisdiction over the defendant, the trial court” may not “destroy the subject matter of the appeal.”); Philip J. Padovano, 2 Fla. Practice, Appellate Practice § 24:6 (2014 ed.) (“Appeals from orders determining personal jurisdiction are unlike appeals from most other nonfinal orders in the respect that almost all proceedings in the trial court, including discovery, will be suspended until resolution of the appeal.”). Kinja does not, and shall not be deemed to, admit any of the allegations of the Complaint during the appeal and expressly reserves its right to answer should the appellate court determine that this Court has personal jurisdiction, including to deny or

otherwise respond to any and all allegations of the Complaint, to assert affirmative defenses, and/or to plead counterclaims.

Dated: May 27, 2014

Respectfully submitted,

THOMAS & LOCICERO PL

By: /s/ Gregg D. Thomas

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of May 2014, I caused a true and correct copy of the foregoing to be served via the Florida Courts' E-Filing Portal upon the following counsel of record:

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