

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.

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**NOTICE REGARDING DISCOVERY DIRECTED TO  
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, respond to plaintiff’s discovery requests directed to it, specifically, his First Set of Interrogatories and his First Request for the Production of Documents served on May 2, 2014. *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.”); *see also Far Out Music, Inc. v. Jordan*, 438 So. 2d 912, 913 (Fla. 3d DCA 1983) (no discovery permitted during pendency of appeal from decision denying motion to dismiss for lack of personal jurisdiction); 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, waive any objections that it may have to the discovery requests, and it expressly reserves its right to assert any and all such objections should the appellate court determine that this Court has personal jurisdiction.

Dated: June 4, 2014

Respectfully submitted,

THOMAS & LOCICERO PL

By: /s/ Gregg D. Thomas

Gregg D. Thomas

Florida Bar No.: 223913

Rachel E. Fugate

Florida Bar No.: 0144029

601 South Boulevard

P.O. Box 2602 (33601)

Tampa, FL 33606

Telephone: (813) 984-3060

Facsimile: (813) 984-3070

gthomas@tlolawfirm.com

rfugate@tlolawfirm.com

Seth D. Berlin

Pro Hac Vice Number: 103440

Michael Berry

Pro Hac Vice Number: 108191

Alia L. Smith

Pro Hac Vice Number: 104249

Paul J. Safier

Pro Hac Vice Number: 103437

Julie B. Ehrlich

Pro Hac Vice Number: 108190

LEVINE SULLIVAN KOCH & SCHULZ, LLP

1899 L Street, NW, Suite 200

Washington, DC 20036

Telephone: (202) 508-1122

Facsimile: (202) 861-9888

sberlin@lskslaw.com

mberry@lskslaw.com

asmith@lskslaw.com

psafier@lskslaw.com

jehrich@lskslaw.com

*Counsel for Specially-Appearing  
Defendant Kinja, KFT*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 4th day of June 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:

Kenneth G. Turkel, Esq.  
kturkel@BajoCuva.com  
Christina K. Ramirez, Esq.  
cramirez@BajoCuva.com  
Bajo Cuva Cohen & Turkel, P.A.  
100 N. Tampa Street, Suite 1900  
Tampa, FL 33602  
Tel: (813) 443-2199  
Fax: (813) 443-2193

David Houston, Esq.  
Law Office of David Houston  
dhouston@houstonatlaw.com  
432 Court Street  
Reno, NV 89501  
Tel: (775) 786-4188

Charles J. Harder, Esq.  
charder@HMAfirm.com  
Douglas E. Mirell  
dmirell@HMAfirm.com  
Harder Mirell & Abrams LLP  
1925 Century Park East, Suite 800  
Los Angeles, CA 90067  
Tel: (424) 203-1600  
Fax: (424) 203-1601

*Attorneys for Plaintiff*

Barry A. Cohen, Esq.  
bcohen@tampalawfirm.com  
Michael W. Gaines, Esq.  
mgaines@tampalawfirm.com  
Barry A. Cohen Law Group  
201 East Kennedy Boulevard, Suite 1000  
Tampa, FL 33602  
Tel: (813) 225-1655  
Fax: (813) 225-1921

*Attorneys for Defendant Heather Clem*

/s/ Gregg D. Thomas  
Attorney