

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

Case No.: 12012447-CI-011

vs.

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

Defendants.

_____ /

**VERIFIED MOTION FOR ADMISSION OF
MICHAEL D. SULLIVAN TO APPEAR PRO HAC VICE PURSUANT TO
FLORIDA RULE OF JUDICIAL ADMINISTRATION 2.510**

Comes now Michael D. Sullivan, Movant herein, and respectfully requests the following:

1. Movant resides in Arlington, Virginia. Movant is not a resident of the State of Florida.
2. Movant is an attorney and a member of the law firm of Levine Sullivan Koch & Schulz, LLP, 1899 L Street, NW, Suite 200, Washington, DC 20036, Telephone (202) 508-1116, Facsimile (202) 861-9888.
3. Movant's law firm was retained on or about December 28, 2012 by Gawker Media, LLC to provide legal representation in connection with the above-styled matter now pending before the above-named court of the State of Florida (following which the action was immediately removed to federal court and then remanded to the above-named court on March 28, 2013). Movant's law firm has since been retained by defendants Nick Denton, A.J. Daulerio, and Blogwire Hungary Szellemi Alkotást Hasznosító KFT ("Blogwire Hungary"), which is now

known as “Kinja KFT” and which has specially appeared for the purpose of contesting personal jurisdiction over it (together, the “Gawker Defendants”). Movant is joining the Gawker Defendants’ other counsel in representing the Gawker Defendants.

4. Movant is an active member in good standing and currently eligible to practice law in the following jurisdictions: the United States Supreme Court; the United States Courts of Appeals for the Third, Fourth, Fifth, Eighth, Ninth, and District of Columbia Circuits; the United States District Courts for the District of Columbia (Bar No. 339101) and the District of Maryland (Bar No. 12904); and the District of Columbia (Bar No. 339101).

5. There are no disciplinary proceedings pending against Movant.

6. Within the past five (5) years, Movant has not been subject to any disciplinary proceedings.

7. Movant has never been subject to any suspension proceedings.

8. Movant has never been subject to any disbarment proceedings.

9. Movant, either by resignation, withdrawal, or otherwise, never has terminated or attempted to terminate Movant’s office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings.

10. Movant is not an inactive member of The Florida Bar.

11. Movant is not now a member of The Florida Bar.

12. Movant is not a suspended member of The Florida Bar.

13. Movant is not a disbarred member of The Florida Bar nor has Movant received a disciplinary resignation from The Florida Bar.

14. Movant has not previously been disciplined or held in contempt by reason of misconduct committed while engaged in representation pursuant to Florida Rule of Judicial Administration 2.510.

15. Movant has been granted permission to appear as counsel in Florida State courts once during the past five years, as follows:

Date of Motion: April 28, 2014

Case Name: *Baker v. American Media, Inc., et al.*

Case Number: No. 10-59265CA37 (11th Jud. Cir.).

Court: Circuit Court, 11th Jud. Cir., Miami-Dade County

Date Motion Granted: May 20, 2014.

16. Local counsel of record associated with Movant in this matter is Gregg D. Thomas, Esquire, who is an active member in good standing of The Florida Bar and has offices at 601 South Boulevard, P.O. Box 2602 (33601), Tampa, Florida 33606, Telephone (813) 984-3060, Facsimile (813) 984-3070.


17. Movant has read the applicable provisions of Florida Rule of Judicial Administration 2.510 and Rule 1-3.10 of the Rules Regulating The Florida Bar and certifies that this verified motion complies with those rules.

18. Movant agrees to comply with the provisions of the Florida Rules of the Professional Conduct and consents to the jurisdiction of the courts and the Bar of the State of Florida.

WHEREFORE, Movant respectfully requests permission to appear in this court for this cause only.

DATED this 15th day of July, 2014

Respectfully submitted,

By: 
Michael D. Sullivan

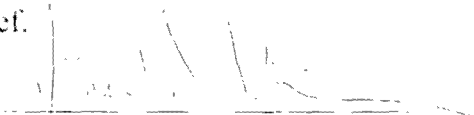
LEVINE SULLIVAN KOCH & SCHULZ, LLP
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Counsel for Gawker Defendants

District of Columbia

City of Washington

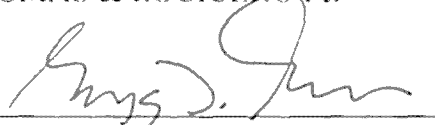
I, Michael D. Sullivan, do hereby swear or affirm under penalty of perjury that I am the movant in the above-styled matter; that I have read the foregoing Motion and know the contents thereof, and the contents are true of my knowledge and belief.


Michael D. Sullivan

I hereby consent to be associated as local counsel of record in this cause pursuant to Florida Rule of Judicial Administration 2.510.

DATED this 16th day of July, 2014

THOMAS & LOCICERO PLLC

By: 
Gregg D. Thomas

Florida Bar No.: 223913
601 South Boulevard
P.O. Box 2602 (33601)
Tampa, FL 33606
Telephone: (813) 984-3060
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of July 2014, a true and correct copy of the foregoing motion was furnished by U.S. mail to PHV Admissions, The Florida Bar, 651 East Jefferson Street, Tallahassee, Florida 32399-2333, accompanied by payment of the \$250.00 filing fee made payable to the Florida Bar. I further certify that on the 16th day of July, 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 Court's E-Filing Portal:

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/s/ Gregg D. Thomas
Attorney