## 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 OF CONFIDENTIAL INFORMATION WITHIN COURT FILING

Pursuant to Florida Rules of Judicial Administration 2.420 (d)(2), Defendants Gawker Media, LLC and A.J. Daulerio, by and through their undersigned counsel, hereby certify that filed herewith are documents that may contain confidential information as described in Rule 2.420(c)(9), specifically Exhibits A and B to their Exceptions to Report and Recommendation Denying Motions for Sanctions. While Defendants filed this Notice to comply with the e-filing procedures, they have also contemporaneously filed a Motion to Determine the Confidentiality of Court Records consistent with Rule 2.420(d)(3) since Rule 2.420(c)(9) governs the type of confidential information allegedly at issue.

Dated: October 30, 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 Sullivan

Pro Hac Vice Number: 53347

Michael Berry

Pro Hac Vice Number: 108191

Alia L. Smith

Pro Hac Vice Number: 104249

Paul J. Safier

Pro Hac Vice Number: 103437

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 msullivan@lskslaw.com mberry@lskslaw.com asmith@lskslaw.com psafier@lskslaw.com

Counsel for Defendants Gawker Media, LLC and A.J. Daulerio

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 30th day of October 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

Charles J. Harder, Esq.
<a href="mailto:charder@HMAfirm.com">charder@HMAfirm.com</a>
Douglas E. Mirell, Esq.
<a href="mailto:dmirell@HMAfirm.com">dmirell@HMAfirm.com</a>
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 1950

Tampa, FL 33602 Tel: (813) 225-1655 Fax: (813) 225-1921

Attorneys for Defendant Heather Clem

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

/s/ *Gregg D. Thomas*Attorney