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,

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VERIFIED MOTION FOR ADMISSION TO APPEAR *PRO HAC VICE* PURSUANT TO FLORIDA RULE OF JUDICIAL ADMINSTRATION 2.510

Comes now **Sarah E. Luppen, Esquire**, and Movant herein, and respectfully represents the following:

- 1. Movant resides in Los Angeles, California. Movant is not a resident of the State of Florida.
- 2. Movant is an attorney and a member of the law firm of Harder Mirell & Abrams, LLP, 1925 Century Park East, Suite 800, Los Angeles, CA 90067, Telephone (424) 203-1600, Facsimile (424) 203-1601.

- 3. As a member of the above-named law firm, Movant has been asked to provide legal representation to Plaintiff in connection with the above-styled matter now pending before the above-named court of the State of Florida.
- 4. Movant is an active member in good standing and currently eligible to practice law in the following jurisdictions: the California Bar (Bar # 258559); and the United States District Courts for the Central and Northern Districts of California.
 - 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 filed no motions to appear as counsel in Florida state courts during the past five (5) years.

16. Local counsel of record associated with Movant in this matter is Kenneth G. Turkel, Esquire, who is an active member in good standing of the Florida Bar and has offices at 100 North Tampa Street, Suite 1900, Tampa, Florida 33602, Telephone (813) 443-2199, Facsimile (813) 443-2193.

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 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 3rd day of November, 2014.

Sarah E. Luppen, Esquire

Harder Mirell & Abrams LLP

1925 Century Park East, Suite 800

Los Angeles, CA 90067

Tel: (424) 203-1600

Fax: (424) 203-1601 sluppen@hmafirm.com

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

I, Sarah E. Luppen, Esquire, do hereby swear or affirm under penalty of

perjury that I am the Movant in the above-styled mater; that I have read the

foregoing Motion and know the contents thereof, and the contents are true of my

own knowledge and belief.

Sarah E. Luppen, Esquire

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 __4th day of November, 2014.

/s/ Kenneth G. Turkel

Kenneth G. Turkel, Esq.

Florida Bar No. 867233

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Florida Bar No. 867233

Email: kturkel@bajocuva.com

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that 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 a true and correct copy of the foregoing has been furnished via e-mail this 4th day of November, 2014 to the following:

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/s/ Kenneth G. Turkel
Attorney