

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.

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

Defendants.

DEFENDANTS' UPDATED DEPOSITION DESIGNATIONS

Pursuant to paragraph 18 of the Second Order Setting Jury Trial and Pretrial Conference, Defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio, through their undersigned counsel, hereby serve their updated designations of depositions (via video or otherwise) that they intend to offer as testimony in their case-in-chief. In addition, Defendants intend to offer as evidence the exhibits identified in the designated deposition testimony.

Defendants reserve the right to cross-designate depositions identified by plaintiff Terry Bollea. Depending on the nature of the testimony and evidence offered by plaintiff Terry Bollea in his case-in-chief, Defendants reserve the right not to offer the testimony reflected in the following deposition designations and to designate additional deposition testimony for rebuttal.

1. Deposition of Plaintiff Terry Bollea,
March 6 & 7, 2014, April 9, 2015 (Clearwater, FL):
 - 6:8-20
 - 14:15 – 17:7; 17:8 – 17:25
 - 28:3 – 28:6; 28:16 – 28:24
 - 30:3 – 31:24

- 41:12 – 42:16; 42:22 – 43:12
- 58:13 – 59:23
- 61:4 – 61:17
- 93:9-15
- 128:24 – 129:4; 129:9 – 130:5
- 134:21; 135:4 – 136:19; 138:3 – 139:19
- 148:22 – 150:8; 151:1 – 151:4
- 177:22 – 178:6; 178:15 – 179:4; 179:6 – 179:22; 180:2 – 183:18
- 209:8-17
- 219:2 – 221:5; 221:24 – 222:8
- 225:21 – 226:24; 228:2 – 229:9
- 239:6 – 239:19; 240:6 – 242:19
- 247:18 – 247:23; 248:7 – 248:19; 251:10 – 251:15
- 253:23 – 254:5
- 263:16 – 263:25; 264:6 – 266:11; 267:8 – 267:16
- 273:17 – 275:21
- 280:1-9
- 282:3 – 284:14
- 285:10-23
- 287:13 – 288:15
- 318:20 – 319:6
- 321:7 – 326:9
- 328:11 – 329:23
- 336:10-19

- 341:21 – 342:18
- 346:21 – 346:24; 347:22 – 348:19
- 368:4 – 368:19
- 416:21 – 417:5
- 446:11 – 447:22
- 476:4 – 476:11; 480:20 – 482:24
- 491:6 – 497:22
- 497:25 – 498:21
- 508:21 – 508:25; 509:24 – 511:1
- 536:15-21
- 538:22 – 541:22; 542:4 – 544:10
- 556:18 – 558:1
- 560:2 – 560:19; 561:24 – 563:13; 564:7 – 566:20
- 569:9 – 571:19
- 580:22-24; 581:12-14; 582:9-15
- 586:20 – 587:5
- 590:17 – 590:23; 591:24 – 598:9
- 600:6-12
- 607:23 – 612:10
- 612:14 – 618:11
- 618:17 – 620:10
- 658:4 – 659:9
- 675:15 – 676:24
- 678:2 – 679:9

- 738:6 – 738:10; 739:1 – 739:14; 744:18 – 748:14
- 766:20 – 769:11
- 792:20 – 793:1
- 811:8-21
- 812:7-9; 812:12-14

2. Deposition of Jules Wortman, April 7, 2015 (Nashville, Tennessee):

- 4:15 – 4:21
- 12:18 – 13:16
- 15:8 – 16:25
- 17:18-24
- 18:8-10
- 18:13-17
- 20:20 – 21:18
- 22:2-14
- 23:19 – 24:7
- 24:22 – 26:6
- 26:17-23
- 27:2-9
- 27:20 – 28:9
- 28:25 – 30:3
- 30:16 – 32:11
- 32:20 – 33:13
- 39:1-22
- 40:17 – 41:2

- 41:15 – 42:2
- 58:2 – 59:25
- 61:25 – 64:9
- 64:24 – 68:7
- 68:11-19
- 69:25 – 70:12
- 77:20 – 78:7
- 78:20 – 79:8
- 82:19 – 83:9
- 83:14 – 86:5
- 86:18-21

3. Deposition of Elizabeth Traub, March 2, 2015 (New York, New York):

- 5:6 – 5:16
- 12:21 – 13:8
- 18:22 – 19:11
- 21:21 – 22:4
- 29:25 – 30:21
- 31:20 – 33:12
- 34:19 – 35:6
- 35:16 – 36:16
- 41:10 – 42:3
- 43:7 – 43:9
- 43:13 – 44:5
- 44:23 – 45:18

- 46:17 – 46:25
- 86:3 – 10
- 87:3-7
- 87:20 – 88:25
- 89:15-24
- 90:16-23
- 93:13 – 96:9
- 96:17 – 97:3
- 97:12 – 98:15
- 99:6-16
- 99:20 – 100:9
- 102:14-17
- 103:2 – 105:18
- 105:25 – 108:23
- 109:13 – 112:4
- 112:24 – 117:15
- 122:6-8
- 124:12 – 125:2
- 125:24 – 128:5
- 128:20-21
- 129:6 – 133:14
- 134:13-19
- 135:5 – 141:16
- 154:22 – 156:23

4. Deposition of David Rice, March 9, 2015 (Burlington, Vermont):

- 3:10-12
- 6:13 – 8:23
- 9:10 – 10:5
- 12:16 – 13:6
- 13:21 – 14:9
- 14:22 – 15:17
- 16:17 – 16:20
- 17:12 – 22:4
- 23:23 – 26:25
- 27:12 – 30:15
- 31:4 – 31:9

5. Deposition of Heather Cole, January 26, 2015 (Tampa, Florida):

- 6:2 – 6:4
- 9:4 – 10:7
- 10:15 – 11:1
- 11:8 – 11:17
- 11:21-25
- 12:3 – 12:5
- 12:10 – 13:11
- 13:17 – 14:10
- 14:19 – 15:2
- 15:10 – 16:20
- 17:15 – 18:7

- 18:14 – 18:20
- 20:19 – 20:24
- 21:10 – 22:9
- 22:2 – 22:9
- 23:22 – 24:21
- 25:25 – 26:18
- 27:12 – 27:23
- 28:8 – 28:10
- 28:21 – 29:3
- 37:20 – 37:22
- 38:2 – 38:18
- 39:20 – 40:6
- 41:5 – 42:2
- 42:5 – 42:19
- 43:19 – 43:24
- 45:19 – 46:11
- 47:5-12
- 47:25 – 48:5
- 48:17 – 49:25
- 52:10 – 53:6
- 54:5 – 54:10
- 54:17 – 55:24
- 59:13 – 59:19
- 62:15-19

- 65:6 – 65:24
- 66:3-10
- 67:4 – 67:6
- 67:7 – 67:10
- 69:5 – 69:11
- 69:14 – 69:16; 69:25 – 70:13
- 71:16 – 71:19
- 72:2 – 73:13
- 73:19 – 73:21
- 74:21 – 75:5; 76:2 – 78:12
- 78:13 – 78:20
- 89:18 – 90:15
- 91:1-6
- 91:11 – 92:6
- 94:13 – 94:23
- 95:1 – 95:8
- 95:19 – 95:21
- 96:4 – 96:8
- 96:16 – 96:22
- 97:10 – 97:11; 97:21 – 98:24
- 99:7 – 99:16
- 99:20 – 100:22
- 100:23 – 101:10
- 101:11-25

- 102:1 – 102:21
- 103:1 – 103:16
- 104:9 – 104:11
- 104:25 – 105:12
- 105:13 – 108:15
- 109:25 – 111:12
- 111:17 – 112:2
- 112:16 – 113:11
- 115:4 – 115:17
- 116:25 – 117:23
- 118:17 – 119:11
- 119:14 – 120:10

6. Deposition of Tony Burton, March 2, 2015 (New York, New York):

- 5:12 – 5:15
- 11:22 – 12:16
- 13:13 – 13:24
- 14:11 – 16:14
- 17:8 – 18:23
- 19:5 – 20:11
- 21:12 – 26:4
- 26:17 – 26:24
- 44:20 – 44:23
- 45:25 – 46:7
- 56:5 – 56:12

7. Deposition of David Houston, April 10, 2015 (Reno, Nevada):

- 7:11 – 7:24
- 10:6 – 10:21
- 19:19 – 20:2
- 22:14 – 22:18; 23:6 – 23:16; 24:7 – 24:13
- 25:6 – 25:8
- 25:18 – 26:3
- 26:14 – 27:1
- 27:3 – 27:13
- 29:5 – 29:9
- 31:2 – 31:9
- 32:23 – 33:5
- 33:10 – 33:25
- 34:1 – 34:5
- 38:14 – 39:4
- 40:10 – 41:8
- 41:20 – 44:8
- 44:9 – 44:19
- 45:1 – 45:12
- 49:13 – 49:19
- 51:3 – 51:10
- 51:24 – 52:9
- 52:21
- 53:12 – 54:11

- 54:21 – 54:24
- 55:10 – 55:12
- 56:22 – 57:3
- 57:16 – 58:4
- 60:5 – 60:10
- 62:8 – 62:12
- 63:1 – 63:12; 63:17 – 63:24
- 64:6 – 65:3
- 65:21 – 65:23
- 67:16 – 68:7
- 68:8 – 68:11
- 69:8 – 69:25
- 70:12 – 72:2
- 74:11 – 74:14
- 74:16 – 75:16
- 77:2 – 77:17
- 78:8 – 79:6
- 79:13 – 79:25
- 84:16 – 84:22
- 85:4 – 86:1
- 86:5 – 86:10
- 86:14 – 87:8
- 87:9 – 87:18
- 88:6 – 88:21

- 89:11 – 89:19
- 94:7 – 94:22; 95:1 – 95:14
- 95:15 – 96:9
- 96:14 – 97:1
- 99:20 – 100:3
- 100:12 – 101:3
- 101:5-101:7
- 102:20 – 103:15
- 106:12 – 107:9
- 107:23 – 109:12
- 111:10 – 112:2
- 112:5 – 112:19
- 113:18 – 114:3
- 114:23 – 115:6
- 115:24 – 116:14
- 118:5 – 118:18
- 121:7 – 121:15
- 121:20 – 123:13
- 124:18 – 129:7
- 129:16 – 130:18
- 130:19 – 130:25
- 131:22 – 132:2
- 133:19 – 133:22
- 134:2 – 134:20

- 134:21 – 134:25
- 135:1 – 135:25
- 138:4 – 138:25
- 139:7 – 141:7
- 145:17 – 146:6
- 148:11 – 148:13; 148:17 – 150:8
- 150:9 – 150:15
- 152:2 – 153:9
- 155:18 – 156:6
- 156:14 – 156:25
- 157:14 – 157:18; 157:23 – 158:5
- 158:6 – 158:11
- 159:11 – 160:8
- 171:4 – 171:7
- 171:17 – 172:13
- 172:14 – 175:11
- 179:17 – 180:7
- 180:14 – 180:25
- 181:2 – 181:4
- 182:1 – 183:5
- 183:11 – 184:2
- 184:14 – 184:18
- 184:20 – 186:18
- 187:1 – 187:4, 187:24

- 188:5 – 188:18
- 190:3 – 190:7
- 190:8 – 195:4
- 195:14 – 196:18
- 197:3 – 197:19
- 197:23 – 198:18
- 199:13 – 199:20
- 200:16 – 205:9
- 205:10 – 205:14
- 206:1 – 206:21
- 207:21 – 208:6
- 209:4 – 212:12
- 212:23 – 214:10
- 214:19 – 215:1
- 215:2 – 215:22
- 215:23 – 217:18
- 217:19 – 217:21
- 218:1 – 219:22
- 223:9 – 224:16
- 224:19 – 225:19

January 28, 2016

Respectfully submitted,

THOMAS & LOCICERO PL

By: 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

and

Seth D. Berlin

Pro Hac Vice Number: 103440

Michael D. 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 Defendant Gawker Media, LLC, Nick
Denton, and A.J. Daulerio*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of January, 2016, I caused a true and correct copy of the foregoing to be served via the Florida Courts' E-Filing Portal on the following counsel of record:

Kenneth G. Turkel, Esq.
kturkel@BajoCuva.com
Shane B. Vogt, Esq.
shane.vogt@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

Attorneys for Plaintiff

Charles J. Harder, Esq.
charder@HMAfirm.com
Douglas E. Mirell, Esq.
dmirell@HMAfirm.com
Jennifer McGrath, Esq.
jmcgrath@hmafirma.com
Harder Mirell & Abrams LLP
132 S. Rodeo Drive, Suite 301
Beverly Hills, CA 90212
Tel: (424) 203-1600
Fax: (424) 203-1601

Attorneys for Plaintiff

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

Attorney for Plaintiff

/s/ Gregg D. Thomas

Attorney