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.

____/

NOTICE OF TAKING DEPOSITION

PLEASE TAKE NOTICE, pursuant to Rules 1.310(b)(1) and 1.310(b)(4), Florida Rules

of Civil Procedure, Defendant Gawker Media, LLC, by and through the undersigned attorneys,

will take the deposition testimony of the following:

DEPONENT:Marc HardgroveDATES:February 24, 2015TIME:12:30 p.m., until completionPLACE:Riesdorph Reporting Group
Northern Trust
100 Second Avenue South, Suite 104-S
St. Petersburg, FL 33701
(727) 822-0949

upon oral examination, before an officer duly authorized to administer oaths by the laws of the State of Florida, and a person who is neither a relative, nor attorney, nor counsel of any of the parties and who is neither a relative nor employee of such attorney or counsel, and who is not financially interested in the examination. The oral examination will be taken by an operator from Riesdorph Reporting Group, Northern Trust, 100 Second Avenue South, Suite 104-S, St.

Petersburg, FL 33701, and Defendant Gawker Media, LLC shall bear the initial cost of the deposition.

This deposition is being taken for the purpose of discovery, and for use at trial, or both of the foregoing, or for such other purposes as are permitted under the applicable and governing rules.

Respectfully submitted,

THOMAS & LOCICERO PL

By: <u>/s/ Gregg D. Thomas</u> 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 Defendant Gawker Media, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of December 2014, I caused a true and

correct copy of the foregoing to be served by email 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. charder@HMAfirm.com Douglas E. Mirell, Esq. dmirell@HMAfirm.com Sarah Luppen, Esq. sluppen@HMAfirm.com Harder Mirell & Abrams LLP 1925 Century Park East, Suite 800 Los Angeles, CA 90067 Tel: (424) 203-1600 Fax: (424) 203-1601 David Houston, Esq. Law Office of David Houston dhouston@houstonatlaw.com 432 Court Street Reno, NV 89501 Tel: (775) 786-4188

Attorneys for Plaintiff

Barry A. Cohen, Esq. bcohen@tampalawfirm.com Michael W. Gaines 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

Gregg D. Thomas

Attorney