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

Case No.: 12012447-CI-011

TERRY GENE BOLLEA professionally known as HULK HOGAN,

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VS.

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

Defendants.		
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NOTICE OF VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that, pursuant to Rules 1.310(b)(1) and 1.310(b)(4) of the Florida Rules of Civil Procedure and Section 2020.510 of the California Code of Civil Procedure, Defendant Gawker Media, LLC, by and through the undersigned attorneys, will take the deposition testimony of the following:

DEPONENT: Peter Young

DATE: March 16

TIME: 10:00 a.m., until completion

PLACE: Esquire Solutions

1990 South Bundy

Suite 540

Los Angeles, CA 90017

upon oral examination, before an officer duly authorized to administer oaths by the laws of the State of California, 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 videotaped by an

operator from Esquire Solutions, 1990 South Bundy, Suite 540, Los Angeles, CA 90017, and Defendant Gawker Media, LLC shall bear the initial cost of the videotaping.

This examination will continue from day to day until completed. 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.

December 22, 2014

Respectfully submitted,

THOMAS & LOCICERO PL

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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 electronically upon the following counsel of record at their respective email addresses via the Florida Courts E-Filing Portal:

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