

**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. 12012447 CI-011

HEATHER CLEM; GAWKER MEDIA, LLC
AKA GAWKER MEDIA; GAWKER MEDIA
GROUP, INC. AKA GAWKER MEDIA; et. al.,

Defendants.

_____/

**NOTICE OF TAKING VIDEOTAPED DEPOSITION OF
CUSTODIAN OF RECORDS, GAWKER MEDIA LLC**

PLEASE TAKE NOTICE that, Pursuant to Rules 1.310(b)(1) and 1.310(b)(4) of the Florida Rules of Civil Procedure, Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan (“Bollea”) by and through the undersigned attorneys, will take the deposition testimony of the following:

DEPONENT: **Custodian of Records, Gawker Media LLC
210 Elizabeth Street, 4th floor
New York, NY 10012**

DATE: **March 3, 2015**

TIME: **9:00 a.m. until completion**

LOCATION: **Merrill Corporation, 1345 Avenue of the Americas, 17th Floor
New York, NY 10105**

by oral examination before a member of Merrill Corporation, or a Notary Public in and for the State of New York at Large, and or some other officer duly authorized by law to take depositions.

The deposition shall continue from day to day until completed. The deposition may be recorded by video and/or using instant visual display of the testimony (e.g., Live Note), as well as stenographically. Plaintiff Bollea shall bear the initial cost of the videotaping.

PLEASE GOVERN YOURSELF ACCORDINGLY.

DATED: January 16, 2015

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-Mail via the e-portal system this 16th day of January, 2015 to the following:

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